



# Privacy Policy and Collection Statement

as at 9 February 2022

## About AAP

Australian Associated Press Ltd ABN 94 641 582 121 (AAP) is a not for profit company established to advance tolerance and understanding by protecting independent, ethical and sustainable news gathering and reporting in Australia. AAP provides media companies and corporations and the public with news and information of public interest. As the acquirer of the former Australian Associated Press Pty Ltd's Newswire and FactCheck businesses, AAP continues its 85 year legacy of providing fast impartial breaking news to media outlets worldwide.

## Introduction

We are committed to protecting and maintaining your privacy and we are bound by the Australian Privacy Principles (APPs) and the *Privacy Act 1988 (Cth)* (Act). This Privacy Policy describes the types of personal information we may collect, and how we use, hold and disclose this personal information.

## Privacy standards for journalists

This Privacy Policy does not apply to personal information collected by our journalists and photographers for the purpose of gathering news as the APPs do not apply to acts or practices engaged in by us in the course of journalism. However, we are committed to our own journalistic standards dealing with privacy. We handle the information we collect in the course of journalism in accordance with our code of practice, which can be found at <https://www.aap.com.au/about-us>.

## What is your personal information?

When used in this privacy policy, the term “personal information” has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify you. This may include your name, address, telephone number, email address and profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.



## What kind of information do we collect?

The type of personal information we collect will vary depending on the nature of your dealings with us. We only collect personal information that we need for our business activities, or which you volunteer to us.

In general, the type of personal information we collect and hold could include your name, address (postal and email) and other contact details, geographic location, gender, age or date of birth, profession, occupation or job title, and transaction details relating to your use of our products and services.

## How do we collect it?

We may collect your personal information via our websites, apps, over the phone, when you apply for a job with us, when you write to us, unsolicited information you send, when you attend an event or program run by us or when you participate in a survey, questionnaire, competition, fundraising campaign or other marketing campaign or via a photograph (where your identity is clear or can be reasonably ascertained from the relevant image). Examples are set out below.

**Fundraising Campaigns** If you contribute to a fundraising campaign certain personal information will be received by us in accordance with that platform's policies. The fundraising platform will collect, use and disclose your information in accordance with their own privacy policy and terms and conditions.

We will only retain your personal information in accordance with our own Privacy Policy and Australian law. As a registered charity with DGR status, we are required to keep records of donations under the *Tax Administration Act 1953 (Cth)*.

**Registration Information** In order to access some of our services and products, you will be asked to register with us by providing us with certain information about you to create an account.

**Activity information** This is information about the visits you make to our websites and apps, which we collect using cookies and other technologies. Further information about our use of cookies and how to block them is provided below (see Cookies and Other Technologies).

**Public information and posts** This includes comments and content you post to our online services. This may include your name, username, comments, likes, tweets, status, profile information and pictures. Public information and posts are available to everyone who views our websites and apps and may be displayed in search engines, even after you cancel an account with us.

**Information from third party social media** If you connect a service to a third-party social media platform such as Facebook or Twitter, we may also collect information from your social



media profile. This may include:

- your username for that third-party social media service;
- any information or content you have permitted the social media service to share with us (such as your profile picture, email address followers or friends lists); and
- any other information you have made public via that social media service (including other posts you make using your social media profile).

When you connect a service to your social media profile, you authorise us to collect and handle your personal information in accordance with this Privacy Policy.

**Information relating to careers and recruitment** This is information you submit to us when applying for a job, cadetship or contract (including freelance work) with us (including unsolicited information). This information may include your name and contact details, prior education and experience, referee details and other information included in your CV or resume. We may collect this information from you, or from recruitment consultants, your previous employers or other references.

**Information from other sources** This includes information we may obtain from third party companies such as credit reporting agencies, law enforcement agencies and other government entities, and information provided to us via networking websites such as LinkedIn, if you are a member.

**Third Party Service Providers** Where you supply personal information to a third party external service provider in the course of dealing with AAP, your information will be collected by that third party service provider in accordance with that third party service provider's privacy policy.

## What happens if we can't collect your personal information?

Where practicable, you can deal with us on an anonymous or pseudonymous basis. But if you choose not to provide us with the personal information we request, this may result in us not being able to:

- provide you certain services or certain features of our services;
- communicate with you;
- provide you with information about products and services that you may want, including information about discounts, sales or special promotions;
- tailor the content of our websites or apps to your preferences, and your experience of our websites or apps may not be as enjoyable or useful; or
- consider you for any existing or future freelance or contract work with us.

## How will we use and disclose your information?

We will use and disclose your personal information for the purposes for which it was collected, for related purposes that you would reasonably expect us to use it for, for



purposes that we are required or permitted to use it for by law or for any other purpose with your consent (whether express or implied). For example, we can use and disclose your personal information to:

- personalise services for you;
- update our records, verify your identity or eligibility for particular products or services, and keep your contact details up to date;
- manage your account, process payments and provide you with customer support;
- provide you with access to protected areas of our websites, platforms and apps and maintain and monitor any account permitting you to do so;
- communicate with you by email, postal mail, telephone and/or mobile devices about new products and services, or opportunities to donate, that may be of interest to you;
- for administrative, marketing (including direct marketing), planning, product or service development, quality control and to perform research and data analysis to improve our products and services. Aggregated information will generally be used for this purpose;
- verify your eligibility and deliver prizes in connection with competitions and contests;
- process and respond to any complaint made by you; and
- perform other functions or services as described to you at the time of collection.

**Fundraising activities:** we may send you marketing material in relation to our fundraising activities but only if you have previously consented to this. At any time you may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list. We keep records of donations received as required under the *Tax Administration Act 1953 (Cth)*.

**Sensitive information:** If we collect any sensitive information such as information relating to your racial or ethnic origin, membership of political bodies, religion or trade unions, sexual preferences or activities, criminal record, state of health or medical history), that information will only be used and disclosed by us for the purpose for which it was provided by you, or otherwise in accordance with privacy laws.

## To whom may we disclose your information?

We share personal information with the following third parties:

**Third party service and content providers** We may make your information available to certain third-party service and content providers. These service and content providers may have access to personal information needed to perform their functions but are not permitted to share or use such information for any other purposes. Our agreements with our third-party providers require them to comply with relevant privacy laws. For example, we use third party service providers for cloud services; information technology services; website hosting; telecommunications; mailing services; courier services; payment processing; data entry, data research and analytics services; call centre services; debt collection; direct marketing



services; security services; and professional advisors such as accountants, solicitors, insurance brokers, business advisors, recruitment agents and consultants.

On some occasions, personal information collected by us maybe stored, disclosed and processed both in Australian and/or overseas, including but not limited to New Zealand, the UK, the US, the EU, Singapore and Mauritius. In these circumstances, we will use reasonable endeavours to ensure that the foreign entity to which your personal information is transferred has appropriate measures in place to protect your personal information.

**Social media providers to allow sharing functionality** If you connect your account with a social media profile (if applicable), you authorise us to share your personal information (including your user name, picture, tweets, likes and posts) with that social media service provider, other users of that service and your friends or followers. You understand that the social media service provider may handle this information in accordance with its own privacy policy. If you do not want your personal information shared in this way, please do not connect your social media profile with your account and do not participate in social sharing via our services.

We also share the information we collect about you for the following additional purposes:

**To protect our rights and the rights of others** We may share your information with other third parties without your consent if the disclosure is, for example:

- required or authorised by law;
- required in order to investigate an unlawful activity or reasonably necessary to protect our rights or the rights of others;
- required by an enforcement body for investigative activities; or
- necessary to prevent a serious and imminent threat to a person's life, health or safety, or to public health or safety.

**To complete a re-organisation merger or sale of assets** If we sell, or engage in a sale process in relation to, all or part of our business or assets, we may disclose your information to the party or parties involved in the sale transaction. We may also do this if we are involved in a merger or transfer of all or a material part of our business.

**Careers and recruitment** Information you submit to us when applying for a job, cadetship or contract (including freelance work) with us to will be used solely in connection with considering and acting upon your application. We may share this information with third party service providers retained by us for recruitment purposes, for example, to analyse candidate submissions for job postings.

**Data and Analysis** We may provide de-identified information to third party data and analysis organisations for commercial purposes such as providing consumer insights, creating marketing statistics, identifying user demands and to assist it in meeting customer needs generally and for internal and stakeholder reporting and analysis.



## What marketing communications will you receive?

We will only send you communications for marketing purposes where you have agreed to this.

These communications may be sent in various forms, including mail, SMS, and email, in accordance with applicable marketing laws, such as the *Spam Act 2003 (Cth)*.

You may opt-out of receiving marketing communications from us at any time by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list.

## Security and management of your information

We understand that the security of your personal information is important. We take reasonable efforts to use procedures and security features to try to ensure that your personal information is properly protected from misuse or loss, and unauthorised access, modification or disclosure.

**System security** We store information in electronic databases requiring logins and passwords and use computer and network security measures such as firewalls, data encryption and virus detection methods.

**Property security** We maintain physical security over our paper and electronic data stores, such as locks and security systems. We engage security personnel and use ID cards to control access to our business premises.

**Staff training**, we train our staff to handle your information in accordance with this Privacy Policy and applicable privacy laws.

**Third parties** We impose strict requirements on all third parties as to how they store, handle and deal with personal information. In all instances, as far as reasonably practicable, we make sure that our relationships with third parties include appropriate protection of your personal information.

**Your role** You can help us to keep your information secure; please remember that any username or password in relation to our websites and apps is personal to you and should not be made available to any other person. You should stop using your username and password and notify us immediately if you suspect that someone else may be using them.

**Cookies and other technologies** In some cases, we may collect your personal information through the use of “cookies” and mobile device identifiers (e.g. Android or iOS advertising identifiers) or similar technology used to collect data on our websites and apps. Cookies are pieces of information that a website transfers to your computer’s hard disk for record-keeping purposes. Cookies, in and of themselves, do not personally identify users, although they do identify a user’s browser. If you then register with us, we will retain the information



we received from your cookie. This may enable us to recognise your computer and greet you each time you visit our website without bothering you with a request to register or sign in. It also enables us to keep track of products or services you view so that, if you consent, we can send you news about those products or services. We also use cookies to measure traffic patterns, to determine which areas of our website have been visited and to measure transaction patterns in the aggregate. We use this to research our users' habits so that we can improve our online products and services.

AAP uses Google Analytics in connection with its websites and apps. By accessing AAP's websites and apps, you consent to the storing and accessing of cookies or other information on your device where such activity occurs in connection with Google Analytics. Details of how Google uses data it collects from AAP websites and apps can be found at [www.google.com/policies/privacy/partners/](http://www.google.com/policies/privacy/partners/) (or any other URL Google may provide from time to time).

You can control information collected by cookies. You can block or delete cookies by changing your browser settings. Click "help" in the toolbar of most browsers for instructions. You can also contact us for assistance as set out below.

### How can you access or correct your personal information?

You have the right to request access to the personal information we hold about you. If you would like to seek access, please contact us as set out below. We will try to acknowledge your request within 7 days and to provide you with access within 30 days of the date of receipt of your request. We will notify you if we consider it will take longer than 30 days to provide you with access. We may charge you a reasonable fee to cover our administrative and other reasonable costs in providing the information to you. We may also refuse to provide access (for example, if granting access would interfere with the privacy of others or result in a breach of confidentiality). If we refuse your access request, we will provide you with a written notice setting out our reasons for refusing (unless unreasonable to do so) and how you may complain about our refusal.

**Changes to your information** If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it, if you cannot amend it via one of our online services. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment, then we will make a record noting that you disagree with it.

### Other important information for you

**Third party sites** Our websites and apps may provide links to websites and apps which are controlled by third parties. These may include but are not limited to Facebook, Twitter, LinkedIn and YouTube. Please be aware that these websites and apps have their own privacy



policies and that we cannot accept any responsibility for their use of information about you. We recommend that you consult the privacy statements of all third-party websites and apps you visit.

**Collection of personal financial information by a payment service provider** Sometimes we allow you to use an external payment service to purchase a product, make a donation or make payments for our services (**Payment Service**). Any information you provide when using a Payment Service may be collected and used by the Payment Service provider in accordance with that provider's privacy policy. You should check the provider's privacy policy to understand how it will handle your information.

**Data retention** If you close an account you have with us, we may retain certain information associated with your account for analytical purposes and record keeping integrity, as well as to prevent fraud, or to maintain systems security. We may also retain your information if required by law, regulation or relevant standards and codes of conduct, or to fulfil our contractual obligations to a third party.

**Complaints** If you believe that we have breached the Act or other applicable privacy laws, please send us a written description of your privacy complaint. We will take all reasonable steps to reply to your complaint. If we take more than 30 days to respond to your complaint, or if you are dissatisfied with our response, you may contact the Office of the Australian Information Commissioner at 1300 363 992 or [www.oaic.gov.au](http://www.oaic.gov.au).

**Changes to this Privacy Policy** We will occasionally need to revise this Privacy Policy, to reflect developments in technologies and information governance practices as well as changes in our business. You should therefore review this page regularly to ensure that you are aware of any changes to its terms. Any updated version of this privacy policy will become effective when we post it on our website.

**Contact us** We welcome feedback about privacy issues and will attend to all questions and complaints promptly. You can contact us about any privacy issues as follows:

**By email:**

[privacy@aap.com.au](mailto:privacy@aap.com.au)

**By mail:**

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