

CSM AUSTRALIA

PRIVACY POLICY

CSM'S COMMITMENT TO PRIVACY

CSM Sport and Entertainment Australia Pty Ltd, its subsidiaries and affiliates in Australia (collectively referred to as **CSM**) are committed to managing personal information in accordance with the Australian Privacy Principles under the *Privacy Act 1988* (Cth) and in accordance with other applicable privacy laws.

This document sets out our policies for managing your personal information and is referred to as our **Privacy Policy**.

In this Privacy Policy, "we" and "us" refers to CSM and "you" refers to any individual about whom we collect personal information.

ABOUT CSM

CSM is a global organisation comprising a number of divisions including "CSM Strategic", "Essentially Group", "Fast Track Agency", "Full Access Hospitality", "Golden Goal", "ICON", "iLUKA", "JMI" and "People Marketing".

CSM offers a complete range of services to assist brands, federations or governing bodies to grow their business and increase their audience, including event feasibility and planning; strategic and commercial consultancy; event creation; management and delivery; advertising and rights sales; broadcast services; athlete management and ambassador programmes; sponsorship activation and rights management; sport, commercial and cultural branding; interactive live experiences; exhibitions and retail display; and sports academies.

Please contact us for a full list of the companies which comprise CSM and which are subject to this Privacy Policy.

WHAT INFORMATION DOES CSM COLLECT ABOUT YOU?

Clients and prospective clients

When you enquire about our services or when you become a client of CSM, a record is made which includes your personal information.

The type of personal information that we collect will vary depending on the circumstances of collection and the kind of service that you request from us, but will typically include:

- your name, e-mail, postal address and other contact details;
- information about your employer or an organisation who you represent;
- your professional details; and
- any additional personal information you provide to us, or authorise us to collect, as part of your interaction with CSM.

Prospective employees/applicants

We collect personal information when recruiting personnel, such as your name, contact details, qualifications and work history. Generally, we will collect this information directly from you.

We may also collect personal information from third parties in ways which you would expect (for example, from recruitment agencies or referees you have nominated). Before offering you a position, we may collect additional details such as your tax file number and superannuation

information and other information necessary to conduct background checks to determine your suitability for certain positions (for example, positions which involve working with children).

Other individuals

CSM may collect information personal information about other individuals who are not clients of CSM. This includes customers and members of the public who participate in events we are involved with; individual service providers and contractors to CSM; and other individuals who interact with CSM on a commercial basis. The kinds of personal information we collect will depend on the capacity in which you are dealing with CSM. Generally, it would include your name, contact details, and information regarding our interactions and transactions with you.

If you are participating in an event we are managing or delivering, we may take images or audio-visual recordings which identify you.

In limited circumstances, CSM may collect information which is considered sensitive information. For example, if you are injured at an event promoted or delivered by CSM we may collect health information about you in an emergency or otherwise with your consent.

We may collect personal information about children (for example, when children participate in events we are involved with). Where children do not have sufficient maturity and understanding to make decisions about their personal information, we will require their parents or guardians to make decisions on their behalf.

You can always decline to give CSM any personal information we request, but that may mean we cannot provide you with some or all of the services you have requested. If you have any concerns about personal information we have requested, please let us know.

Visitors to our websites

The way in which we handle the personal information of visitors to our websites is discussed below.

HOW AND WHY DOES CSM COLECT AND USE YOUR PERSONAL INFORMATION?

CSM collects personal information reasonably necessary to carry out our business, to assess and manage our clients' needs, and provide services including managing, marketing and delivering entertainment and sporting events. We may also collect information to fulfil administrative functions associated with these services, for example billing, entering into contracts with you and/or third parties and managing client relationships.

The purposes for which we usually collect and use personal information depends on the nature of your interaction with us, but may include:

- responding to requests for information and other general inquiries;
- managing, planning, advertising and administering programs, events, competitions and performances;
- researching, developing and expanding our facilities and services;
- informing you of our activities, events, facilities and services;
- recruitment processes (including for volunteers, internships and work experience); and
- responding to enquires and complaints.

CSM generally collects personal information directly from you. We may collect and update your personal information over the phone, by email, over the internet or social media, or in person. We may also collect personal information about you from other sources, for example:

- our affiliated and related companies;

- our business clients such as venues, promoters and sporting clubs; and
- third party suppliers and contractors who assist us to operate our business.

CSM also collects and uses personal information for market research purposes and to innovate our delivery of products and services.

HOW DOES CSM INTERACT WITH YOU VIA THE INTERNET?

You may visit our websites (www.csm.com and websites for other divisions of CSM) without identifying yourself. If you identify yourself (for example, by providing your contact details in an enquiry), any personal information you provide to CSM will be managed in accordance with this Privacy Policy.

CSM's websites use cookies. A 'cookie' is a small file stored on your computer's browser, which assists in managing customised settings of the website and delivering content. We collect certain information such as your device type, browser type, IP address, pages you have accessed on our websites and on third-party websites. You are not identifiable from such information.

You can use the settings in your browser to control how your browser deals with cookies. However, in doing so, you may be unable to access certain pages or content on our website.

CSM's websites may contain links to third-party websites. CSM is not responsible for the content or privacy practices of websites that are linked to our website.

CAN YOU DEAL WITH CSM ANONYMOUSLY?

CSM will provide individuals with the opportunity of remaining anonymous or using a pseudonym in their dealings with us where it is lawful and practicable (for example, when making a general enquiry). Generally it is not practicable for CSM to deal with individuals anonymously or pseudonymously on an ongoing basis. If we do not collect personal information about you, you may be unable to utilise our services or participate in our events, programs or activities we manage or deliver.

HOW DOES CSM HOLD INFORMATION?

CSM stores information in paper-based files or other electronic record keeping methods in secure databases (including trusted third party storage providers based in Australia and overseas). Personal information may be collected in paper-based documents and converted to electronic form for use or storage (with the original paper-based documents either archived or securely destroyed). We take reasonable steps to protect your personal information from misuse, interference and loss and from unauthorised access, modification or disclosure.

CSM maintains physical security over paper and electronic data stores, such as through locks and security systems at our premises. We also maintain computer and network security; for example, we use firewalls (security measures for the Internet) and other security systems such as user identifiers and passwords to control access to our computer systems.

Our websites do not necessarily use encryption or other technologies to ensure the secure transmission of information via the internet. Users of our websites are encouraged to exercise care in sending personal information via the internet.

We take steps to destroy or de-identify information that we no longer require.

DOES CSM USE OR DISCLOSE YOUR PERSONAL INFORMATION FOR DIRECT MARKETING?

CSM may use or disclose your personal information for the purpose of informing you about our services, upcoming promotions and events, or other opportunities that may interest you. If you do not want to receive direct marketing communications, you can opt-out at any time by contacting us using the contact details below.

If you opt-out of receiving marketing material from us, CSM may still contact you in relation to its ongoing relationship with you.

HOW DOES CSM USE AND DISCLOSE PERSONAL INFORMATION?

For clients

The purposes for which we may use and disclose your personal information will depend on the services we are providing you. For example, if you have engaged us to deliver an event, we may disclose information about you to venues, service providers and sponsors where this is relevant to our services. If you have engaged us to manage or represent your interests, we will disclose your personal information in ways you would expect to sponsors, broadcasters and other parties where this is relevant to developing your profile and career.

For customers and participants

If you are a customer or participant in an event, we may disclose your personal information to our clients, event promoters, venues and sponsors where this is reasonably necessary for, and relevant to, the delivery of the event. We may use images or audio-visual recordings which identify you for promotional purposes where you would reasonably expect this to occur.

Disclosure to contractors and other service providers

CSM may disclose information to third parties we engage in order to provide our services, including contractors and service providers used for data processing, data analysis, customer satisfaction surveys, information technology services and support, website maintenance/development, printing, archiving, mail-outs, and market research.

Personal information may also be shared between related and affiliated companies of CSM, located in Australia and overseas.

Third parties to whom we have disclosed your personal information may contact you directly to let you know they have collected your personal information and to give you information about their privacy policies.

Use and disclosure for administration and management

CSM will also use and disclose personal information for a range of administrative, management and operational purposes. This includes:

- administering billing and payments and debt recovery;
- planning, managing, monitoring and evaluating our services;
- quality improvement activities;
- statistical analysis and reporting;
- training staff, contractors and other workers;
- risk management and management of legal liabilities and claims (for example, liaising with insurers and legal representatives);
- responding to enquiries and complaints regarding our services;
- obtaining advice from consultants and other professional advisers; and
- responding to subpoenas and other legal orders and obligations.

Other uses and disclosures

We may use and disclose your personal information for other purposes explained at the time of collection or otherwise as set out in this Privacy Policy.

DOES CSM DISCLOSE YOUR PERSONAL INFORMATION OVERSEAS?

CSM is a global organisation and works with clients, service providers, sponsors and commercial interests across the globe. It is likely that your personal information will be disclosed to overseas recipients.

Unless we have your consent, or an exception under the Australian Privacy Principles applies, we will only disclose your personal information to overseas recipients where we have taken reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to your personal information.

Entities which are related entities of CSM, or are otherwise affiliated with CSM, have operations in Australia, New Zealand, UK, Europe, North America, South America, the Middle East, South Africa, Singapore, China, Hong Kong and Japan. In circumstances where your information is disclosed to overseas recipients, those recipients are likely to be located in countries in the regions in which CSM and its related entities and affiliates operate.

HOW CAN YOU ACCESS OR SEEK CORRECTION OF YOUR PERSONAL INFORMATION?

You are entitled to access your personal information held by CSM on request. To request access to your personal information please contact our Privacy Officer using the contact details set out below.

You will not be charged for making a request to access your personal information but you may be charged for the reasonable time and expense incurred in compiling information in response to your request.

We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up-to-date. You can help us to do this by letting us know if you notice errors or discrepancies in information we hold about you and letting us know if your personal details change.

However, if you consider any personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading you are entitled to request correction of the information. After receiving a request from you, we will take reasonable steps to correct your information.

We may decline your request to access or correct your personal information in certain circumstances in accordance with the Australian Privacy Principles. If we do refuse your request, we will provide you with a reason for our decision and, in the case of a request for correction, we will include a statement with your personal information about the requested correction.

WHAT SHOULD YOU DO IF YOU HAVE A COMPLAINT ABOUT THE HANDLING OF YOUR PERSONAL INFORMATION?

You may contact CSM at any time if you have any questions or concerns about this Privacy Policy or about the way in which your personal information has been handled.

You may make a complaint about privacy to the Privacy Officer at the contact details set out below.

The Privacy Officer will first consider your complaint to determine whether there are simple or immediate steps which can be taken to resolve the complaint. We will generally respond to your complaint within a week.

If your complaint requires more detailed consideration or investigation, we will acknowledge receipt of your complaint within a week and endeavour to complete our investigation into your complaint promptly. We may ask you to provide further information about your complaint and the outcome you are seeking. We will then typically gather relevant facts, locate and review relevant documents and speak with individuals involved.

In most cases, we will investigate and respond to a complaint within 30 days of receipt of the complaint. If the matter is more complex or our investigation may take longer, we will let you know.

If you are not satisfied with our response to your complaint, or you consider that CSM may have breached the Australian Privacy Principles or the Privacy Act, a complaint may be made to the Office of the Australian Information Commissioner. The Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992 or by using the contact details on the website www.oaic.gov.au.

HOW CHANGES ARE MADE TO THIS PRIVACY POLICY?

CSM may amend this Privacy Policy from time to time, with or without notice to you. We recommend that you visit our website regularly to keep up to date with any changes.

HOW CAN YOU CONTACT CSM?

The contact details for CSM are:

Rob Smith
Privacy Officer
CSM

E rob.smith@csm.com

M +61 411 39 39 38

This Privacy Policy was last updated in June 2016.