

SYDNEY FESTIVAL PRIVACY POLICY

Our Commitment to your Privacy

Sydney Festival is committed to protecting the privacy and security of your personal information. Our purpose is to assure anyone who shares information with us or does business with us that Sydney Festival complies with the *Australian Privacy Act 1988*, the Australian Privacy Principles including the mandatory disclosure rules, and certain overseas requirements.

1. How we collect your personal information

Sydney Festival collects personal information from you in a number of different ways depending on the type of dealings that you may have with Sydney Festival. For example, we will collect your personal information when you buy tickets over the phone by calling our ticketing agencies and venues; or in person at our ticketing agencies and venues; or online through our ticketing agencies and venue websites.

Apart from the collection of personal information through ticket sales, Sydney Festival will also collect personal information over the phone, in person or electronically to undertake our daily artistic and administrative operations.

2. What information we collect

In the course of conducting our business and providing the services to you, Sydney Festival will collect the following personal information:

- Your name and address including postcode;
- Contact, phone and email details;
- Identification information including your login credentials;
- History of your communication with us;
- Your credit card details, however if you purchase tickets or make a donation through the Sydney Festival booking system, no personal details or identifiers are transmitted through the payment gateway;
- Purchase details including purchase amount, date of purchase and payment method;
- Details or history of preference, opinions, interests and behaviours related to our services (such as events or performances that you purchase tickets for), and any other activities on our website.

We may also collect any other personal information that is needed to subscribe you to our services and this includes information that will identify you as an individual. It may include your age or date of birth. If you are offering services to us or seeking to work with us we may record and keep your tax file number, ACN or ABN. We will record information that you provide to us in other ways, for example, by interacting with our webpage, responding to marketing programs, through social media or online forums, participating in offers and promotions, or giving us your business card details at events.

We may record or obtain information about you to ensure the security of your transactions with us. This might mean information from our business partners, financial service providers, identity verification services, and publicly available sources.

3. Why Sydney Festival needs to collect personal information

Sydney Festival will need to collect your personal information for a number of different reasons, dependent on the kind of dealings you may have with the Festival. For example, Sydney Festival may need more information about you when you buy a ticket so you can be notified in the case of changes in date or time of a performance, to send out information about upcoming Sydney Festival performances and also for market research purposes. At any time, you can inform the Festival if you do not want your information used for direct marketing or research purposes by contacting the Sydney Festival Privacy Officer (details below).

4. Use and disclosure of your personal information

Sydney Festival takes its obligations with regards to the use and disclosure of personal information very seriously. In general, Sydney Festival will only use or disclose personal information for the primary purpose that it was collected or for a purpose related to the primary purpose that you would reasonably expect it to be used. For example, the Festival may use your information to contact you about a change in the time of a production.

If Sydney Festival wishes to disclose your information to a third party, it will obtain your consent to do so. However, there may be certain exceptional circumstances that will warrant not obtaining your consent such as circumstances where:

- Sydney Festival needs to use or disclose personal information where it believes the use or disclosure is necessary to protect any person and/or any Sydney Festival rights or property; or
- if the use or disclosure of personal information is authorised or required by law (such as if Sydney Festival is required to disclose personal information to a court in response to a subpoena).

For situations where Sydney Festival collects personal information from individuals who are not customers, the Festival will only use the personal information for the main business purpose that it was collected. For example, the Festival may have the contact details of an individual (such as a mobile or email address) who is the "point of contact" within an organisation with which it does business.

5. Disclosure and other organisations or third party individuals

Sydney Festival will not sell, rent, trade or otherwise supply to third parties any personal information obtained from you unless you consent. However, Sydney Festival may disclose personal information about you in some circumstances including where contractors and service providers help it operate its business or provide a service such as:

- a company which helps Sydney Festival to operate its computer systems (whose contact details can be obtained from the Sydney Festival Privacy Officer); or
- contractors who assist the Festival to send out our mail (whose contact details can be obtained from the Sydney Festival Privacy Officer); or
- circumstances where the individual would reasonably expect personal information to be disclosed (for example, if those third parties are directly involved in the collaboration of a Sydney Festival production for which the personal information was collected).

If Sydney Festival provides your personal information to promoters, or engages contractors and service providers to handle personal information, it requires these organisations or individuals to agree to comply with the Sydney Festival Privacy Policy and the Australian Privacy Principles and with strict conditions governing how personal information is to be handled. Otherwise, you should be aware that Sydney Festival

may be required to disclose your personal information without your consent in order to comply with any court orders, subpoenas, or other legal process or investigation, if such disclosure is required by law.

Depending on your location and subject to applicable law, you may have the following rights with regard to the data Sydney Festival collects about you:

- The right to request confirmation of whether Sydney Festival processes personal information relating to you, and if so, to request a copy of that personal information;
- The right to request that Sydney Festival rectifies or updates your personal information that is inaccurate, incomplete or outdated;
- The right to request that Sydney Festival erases your personal information in certain circumstances provided by law;
- The right to request that Sydney Festival restricts the use of your personal information in certain circumstances, such as while Sydney Festival considers another request that you have submitted (including a request that Sydney Festival makes an update to your personal information); and
- The right to request that Sydney Festival exports to another company, where technically feasible, your personal information that it holds in order to provide services to you.

Where the processing of your personal information is based on your previously given consent, you have the right to withdraw your consent at any time. You may also have the right to object to the processing of your personal information on grounds relating to your particular situation.

6. Direct marketing

Sydney Festival will send direct marketing material to you in situations where:

- the direct marketing material is directly related to the primary purpose that the information was originally collected (for example a ticket buyer who has purchased tickets to Sydney Festival productions will receive direct marketing material about future Sydney Festival productions); and
- it would be in an individual's reasonable expectations that the information will be used to receive direct marketing material (for example, the above ticket buyer may at times receive information about related events).

At any time, an individual can choose to no longer receive marketing material. On all direct marketing, whether its form is electronic or print, there will be a notice on the material giving the individual the opportunity to agree or disagree from receiving marketing material, or "unsubscribe" from receiving further material. Because of the sensitivity of online bookings, for any online collection of personal information, you will also be given an opportunity to not receive marketing material that is generic or untargeted, such as the Sydney Festival regular electronic newsletter.

If you no longer wish to receive promotional information from Sydney Festival please advise the Sydney Festival Privacy Officer. You will need to allow 30 days for you records to be amended.

7. Cookies

To help provides services to you, Sydney Festival may use cookies and other technologies on its website. A cookie is a small piece of text sent to your browser by a website you visit. It helps the website to remember information about your visit, like your planner use and other settings. This can make your next visit easier and the site more useful to you. Cookies play an important role - without them, the Festival website would treat you like a new visitor every time.

There are three main types of cookies – here's how and why Sydney Festival uses them:

1. Site functionality cookies – these cookies allow you to browse the website and access all pages.
2. Site analytic cookies (Google Analytics) – these cookies help Sydney Festival measure and analyse how you use the website.
3. Targeting or advertising cookies – these cookies help Sydney Festival keep track of your site preferences and are used to deliver online marketing and advertising campaigns and materials that are relevant to you.

Sydney Festival may also use electronic images - sometimes called single-pixel GIFs, transparent GIFs, or clear gifs – that allow it to track general user traffic patterns and email open rates. The Festival may also collect information about your online activities on websites and connected devices over time and across third-party websites, devices, apps and other online features and services.

Generally, the information collected by cookies and tracking images may be used for the following purposes:

- to keep track of your opt-in subscriptions and site preferences;
- keeping count of return visits to our website;
- accumulate and report anonymous, aggregate statistical information on email and website usage;
- to optimise online advertising campaigns and deliver you relevant marketing communications.

If you do not wish to receive any cookies you may set your browser to refuse cookies on a site by site basis, however this may mean you will not be able to take full advantage of Sydney Festival services. Sydney Festival does not use cookies to keep personal information of its customers' use of the Sydney Festival website.

Sometimes the Sydney Festival website contains links to third party websites, for your convenience and information. When you access a non-Sydney Festival website, please understand that Sydney Festival is not responsible for the privacy practices of that site. We suggest that you review the privacy policies of each site you visit.

8. Keeping your personal information secure

Sydney Festival has security measures designed to protect against the loss, misuse and/or alteration of the information under its control. These security measures are:

- secure computer network servers:
 - Databases on the internal Sydney Festival server are security protected to limit access to those individuals who collected the information.
 - Access to personal information is limited to Sydney Festival staff who are authorised to do so.

If you would like further details on who does have access to your personal information, please contact the Sydney Festival Privacy Officer.

9. Access to personal information

To obtain a copy of the information we have about you, please come to the Sydney Festival administration office to complete an appropriate access form. A copy will usually be in the form of a print out from an electronic database or a photocopy from the relevant physical record we have on file. We will require personal identification.

There are certain circumstances where an exception to access may apply. These may include situations such as where providing access would pose a serious and imminent threat to the life or health of an individual, or where providing access would have an unreasonable impact upon the privacy of other individuals, or where providing access would be unlawful or where it would prejudice an investigation of possible unlawful activity. There may also be an exception in circumstances where providing access would

reveal the intentions of the organisation in relation to negotiations with the individual in such a way as to prejudice those negotiations.

However, in general Sydney Festival will welcome an individual to access their personal information. There will be no charge for the access of personal information. For a full list of exceptions to access of personal information you may like to read the Australian Privacy Principles, or please feel free to contact the Sydney Festival Privacy Officer.

10. Correcting and updating your file

Sydney Festival will take all necessary steps to ensure that the data is accurate, and where possible, kept up to date.

If an individual wishes to change personal information that is inaccurate or out-of-date, they may contact the Sydney Festival Privacy Officer (details below). Sydney Festival will take reasonable steps to ensure that after being aware of any personal information, having regard to the purposes for which it is processed, that is incomplete or incorrect will be erased or rectified without delay.

The different methods by which an individual can change their details are by phone, in person, by mail or by e-mail. Sydney Festival will adopt a policy of each department reviewing its databases on an annual basis. Any personal information that is no longer used by the Festival (based on the annual review) will be destroyed. The assessment of what personal information is destroyed will vary from department to department depending on the needs of that particular department. All information collected from customers who purchase a ticket to Sydney Festival productions will not be destroyed.

If you want to withdraw your consent or want to erase the personal information we hold about you, please contact Sydney Festival at privacy@sydneyfestival.org.au. We will take reasonable steps to respond to your request and comply to the extent required by applicable law.

11. Use of identifiers

Sydney Festival does not adopt as its own identifier of an individual an identifier that has been assigned by a Commonwealth agency such as a tax file number or Medicare number.

12. Your right to anonymity

Where it is lawful and practicable to do so, customers may undertake business with Sydney Festival without identifying themselves or by using a pseudonym. For example, you may purchase tickets to a Sydney Festival performance by cash payment, in person, over the counter, without being asked for personal details. Naturally, without your personal information we will not be able to contact you if a show is cancelled or details change.

13. Sending information overseas

Sydney Festival will only transfer personal information overseas in circumstances where:

- Sydney Festival reasonably believes that the recipient of the information is subject to legal obligations that are substantially similar to the Australian Privacy Principles and there are mechanisms that the individual can access to take action to enforce that protection under the Australian Privacy Principles; or
- the individual who is the subject of the information has consented; or

- Sydney Festival has taken reasonable steps to ensure that the information it transfers will not be held, used or disclosed by the recipient inconsistently with the Australian Privacy Principles; or
- the disclosure of such information is required or authorised by or under an Australian law or a court/tribunal order.

14. Sensitive information

Sydney Festival will not collect sensitive information about an individual unless the individual has consented to the collection of the sensitive information.

15. Your personal payment information.

If you purchase tickets or make a donation through the Sydney Festival booking system, no personal details or identifiers are transmitted through the payment gateway.

If you are required to pay for the services of Sydney Festival or choose to pay for the services by credit card, your credit card details are not stored with Sydney Festival and cannot be accessed by Sydney Festival staff.

16. Mandatory Data Breach

Sydney Festival is aware of and shall comply with the Mandatory Data Breach reporting obligations under the Privacy Act.

17. Changes to the Sydney Festival Privacy Policy

Sydney Festival reserves the right to change its Privacy Policy at any time and notify its customers by posting an updated version of the policy on its website.

18. Privacy complaints process

If you wish to complain about how Sydney Festival has handled your personal information, please provide the **Sydney Festival Privacy Officer** with full details of your complaint and any supporting documentation by email at privacy@sydneyfestival.org.au.

The Sydney Festival Privacy Officer will endeavour to:

- provide an initial response to your query or complaint within 10 business days, and
- investigate and attempt to resolve your query or complaint within 30 business days or such longer period as is necessary and notified to you.

19. Contact Details

For further information about your personal information held by Sydney Festival, privacy issues and the protection of privacy, please contact the **Sydney Festival Privacy Officer** on:

Phone: (02) 8248 6580
Email: privacy@sydneyfestival.org.au
Address: Level 5, 10 Hickson Road, The Rocks, NSW 2000