

## PRIVACY POLICY

Nova Entertainment Pty Ltd (ABN 75 093 553 989) and its related bodies corporate (**Nova Entertainment/we/our/us**) owns and operates the Nova Entertainment network of radio stations around Australia. The network consists of the following radio stations:

**Nova 96.9**

Level 5  
33 Saunders Street  
PYRMONT NSW 2009

**Nova 100.3**

Level 2  
678 Victoria Street  
RICHMOND VIC 3121

**Nova 106.9**

Level 3  
130 Commercial Road  
TENERIFFE QLD 4005

**Nova 91.9**

Level 3  
75 Hindmarsh Square  
ADELAIDE SA 5000

**Nova 93.7**

Level 1  
464 Hay Street  
SUBIACO WA 6008

**smoothfm 95.3**

Level 3  
33 Saunders Street  
PYRMONT NSW 2009

**smoothfm 91.5**

Level 2  
678 Victoria Street  
RICHMOND VIC 3121

**Star104.5**

Level 1  
4 Ilya Avenue  
ERINA NSW 2250

**FIVEaa**

Level 4  
75 Hindmarsh Square  
ADELAIDE SA 5000

**Koffee (DAB+ station)**

Level 3  
130 Commercial Road  
TENERIFFE QLD 4005

**Novanation ( DAB+ station)**

Level 3  
130 Commercial Road  
TENERIFFE QLD 4005

Nova Entertainment is committed to protecting your privacy. This Privacy Policy sets out how we store, use and disclose your personal information, which we collect through the following channels (each, a **Collection Channel**):

- our online properties (each, a **Website**), including:
  - our websites, including, but not limited to [www.novaentertainment.com.au/](http://www.novaentertainment.com.au/), [www.novafm.com.au/](http://www.novafm.com.au/), [www.smoothfm.com.au/](http://www.smoothfm.com.au/), [www.koffee.com.au/](http://www.koffee.com.au/), [www.novanation.com.au/](http://www.novanation.com.au/), <http://www.fiveaa.com.au/> and <http://www.star1045.com.au/>, <https://www.thesoundbooth.com.au/>;
  - any related Nova Entertainment website, social media page, internal website, intranet and any Nova Entertainment mobile or tablet applications;
- any other means through which an individual provides personal information to Nova Entertainment, including either physically or electronically.

You may contact us with any queries you may have in respect of this Privacy Policy or your personal information by contacting Nova Entertainment's Privacy Officer via email: [privacy@novaentertainment.com.au](mailto:privacy@novaentertainment.com.au).

## **1. PROTECTING YOUR PRIVACY**

- 1.1. We are bound by the Australian Privacy Principles (**APPs**) under the *Privacy Act 1988* (Cth) (**Privacy Act**), except in relation to our activities carried out in the course of journalism. The APPs and this Privacy Policy set out the standards of protection you can expect in respect of your personal information.
- 1.2. Throughout this Privacy Policy, we refer to your 'personal information', which means information which identifies you as an individual or which renders you reasonably identifiable. Your full name, gender, date of birth, home address, home telephone number, mobile telephone number, email address and workplace contact details are examples of information which may constitute personal information. Personal information may also include information we may collect about your individual preferences.
- 1.3. In addition to the provisions of this Privacy Policy, there may also be specific and additional privacy and consent provisions that apply to certain Collection Channels. Because those specific and additional provisions also relate to your privacy protection, we recommend that you review them wherever they appear. In the event of any inconsistency between the provisions of this Privacy Policy and those other specific and additional provisions, the specific and additional provisions will prevail.
- 1.4. By accessing and using Websites or by submitting personal information to us via a Collection Channel, you consent to us using and disclosing your personal information in the ways described in this Privacy Policy.

## **2. JOURNALISM EXCEPTION**

- 2.1 As a media organisation, the APPs do not apply to our activities carried out in the course of journalism. However, we are still committed to protecting your privacy when undertaking such activities.
- 2.2 We therefore publicly commit to comply with the Nova Entertainment Journalism Privacy Standards when engaged in journalism activities, as set out in Annexure A below.

## **3. ANONYMITY AND PSEUDONYMITY**

- 3.1. Where practicable, we will allow you to deal with us on an anonymous or pseudonymous basis. If this is practicable, our Collection Channels will only seek information in this way. However, where it is not practicable for the purposes for which information is collected, we will seek the information identified below. It will not be practicable to deal with you on an anonymous or pseudonymous basis when we wish to send you direct marketing materials, need to provide you with goods or services requested by you or need to respond to a complaint made by you.

## 4. YOUR PERSONAL INFORMATION

4.1 We may collect and hold a variety of personal information about you, including your:

- contact information such as your full name, date of birth, telephone number, mobile telephone number, current and valid email address, residential address and postcode;
- details of the products and services you have purchased from us or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries;
- more detailed contact preferences;
- sensitive information about you;
- your occupation and information regarding your professional history and professional interests;
- information regarding your education and qualifications;
- information regarding your personal interests and interesting and relevant information about you;
- information regarding your physical characteristics;
- information regarding your financial situation;
- your online behaviour and interests based on your online browsing activity (including social interactions);
- information about your experience with our products or services or third party products or services listed on a Website. This information is requested in order to tailor our subsequent communications to you and continuously improve our products and services;
- your bank account details (where you win a cash prize in a promotion or competition);
- the contact details of third parties. If you are asked to provide details about other people, please ensure that these individuals are happy for their details to be given to Nova Entertainment and used for the purposes set out in this policy (which may include using their details for marketing purposes);
- information you provide to us through our customer surveys or visits by our representatives from time to time; and
- any other additional information relating to you that you provide us directly through our Websites or indirectly through the use of our Websites or online presence, through our representatives or through any other Collection Channel.

- 4.2 We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or information from your interaction with our Websites, services, content and advertising, including, but not limited to, device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information.

## **5. SENSITIVE INFORMATION**

- 5.1. We will only collect sensitive information with your consent and where you provide it to us directly. Where you provide us with any sensitive information (including, but not limited to, information about your health, political opinions and philosophical beliefs), we will only use this information for the purposes stated on the Website or other Collection Channel and will share this information with our trusted third parties in the manner stated on the Website, other Collection Channel or in this Privacy Policy.

## **6. HOW WE COLLECT PERSONAL INFORMATION FROM YOU**

- 6.1. We collect your personal information directly from you unless it is unreasonable to do so. We may collect and combine personal information from you in a number of ways, including where you:
- have previously provided us with personal information prior to this Privacy Policy coming into effect;
  - sign-up and/or register to become a member of any Website;
  - purchase a product or service, make a booking, complete an application or participate in any way via a Collection Channel;
  - subscribe to any newsletters, updates, alerts or news and media releases, or request event information or information about our products or services or other information services as well as third party products or services;
  - complete and submit any forms to us;
  - submit a resume or apply for a job with us;
  - participate in any listener loyalty programs;
  - engage in any conversations with our representatives;
  - contact us directly in person or via any medium including mail, telephone, social media and commercial electronic messages (SMS (Short Message Service), MMS (Multimedia Message Service), IM (Instant Messaging) and email) including via the contact details listed on a Website;
  - participate in any offers, promotions, competitions or marketing activities;

- connect to a Website via a third-party social networking services (e.g. Facebook and Twitter);
- stream our products from a Website (including any mobile or tablet application);
- attend an event or activity that we organise, sponsor or are otherwise affiliated with;
- access and interact with a Website for a specific purpose; or
- access and interact with or browse a Website generally.

6.2 We may also collect personal information from third parties, including:

- our related bodies corporate;
- credit reporting agencies;
- your representatives;
- data providers and other organisations that share data in circumstances where it is lawful and/or you have given permission for them to do so (such as social networking sites, databases, online marketing companies and ad targeting companies); and
- law enforcement agencies and other government entities.

6.3 We may supplement the information we collect with information obtained from the third party sources listed above at clause 6.2. For example, we may obtain third party information relating to your advertisement interaction and viewing data, such as ad click-through rates and information about how many times you viewed a particular advertisement.

6.4 We may also collect your personal information from publicly available sources.

## **7. HOW WE COLLECT PERSONAL INFORMATION VIA COOKIES AND RELATED TECHNOLOGIES**

7.1. We collect personal information about you when you use and access our Websites.

7.2. One of the ways we may collect personal information about you is through the use of “cookies”. When you access our Websites, we may send a cookie (which is a small text file containing a unique ID number) to your computer. Cookies may be used, among other things, to track the pages you have visited, to remember your preferences and to store personal information about you. We also use cookies to measure traffic patterns, to determine which areas of our Websites have been visited and to measure transaction patterns in aggregate. We use this to research our listeners habits so that we can improve our online products and services.

7.3. You can adjust your Internet browser to disable cookies or to warn you when cookies are being used. However, if you disable cookies, you may not be able to

access certain areas of our Websites or take advantage of the improved Website experience that cookies offer. For more information about cookies and how you can opt out, you can visit <http://www.youronlinechoices.com.au>.

- 7.4. When you visit our Websites, our web servers may record other information about or relating to you, such as the time and date of your visit or the IP address assigned to the computer you are using to access the Website. In many cases, we cannot and do not use this information to identify you personally - rather, we simply use this information to analyse trends, administer the Websites, track user movements, gather broad demographic information and improve the performance of the Websites.
- 7.5. The third party vendors may also receive and record non-personal information from cookies and similar technology from your browser or mobile device, including your IP address.

## **8. CHILDREN**

- 8.1. Personal information will not be collected by any person who is known by Nova Entertainment to be under the age of eighteen (18) without the consent of a parent or legal guardian. Persons under the age of eighteen (18) may only use our Websites and/or provide personal information with the involvement and consent of a parent or legal guardian.

## **9. HOW WE USE YOUR PERSONAL INFORMATION**

- 9.1. We collect personal information about you so that we can perform our business activities and functions and provide the best quality of customer service. We collect, store, use and disclose your personal information for the following primary purposes:
  - to give you access to our Websites (including any protected areas) and to the content and services on the Websites;
  - to enter you into competitions, promotions and challenges;
  - to administer your participation in any listener loyalty program;
  - to consider you for employment opportunities at Nova Entertainment;
  - to provide products and services to you, fulfil obligations in respect of any contract between Nova Entertainment and you, and to send communications requested by you, including providing information or advice about existing and new products or services;
  - to render services related to the company of Nova Entertainment (including as after sales services and enquiries);
  - to market our products and services (or those of other people) to you, including by email;

- to provide you with newsletters via mail and electronic newsletters (e-newsletters) via commercial electronic messages;
- to conduct business processing functions, including risk management, staff training, accounting, billing, product and service reviews (including providing personal information to our related bodies corporate, contractors, service providers or other third parties);
- to obtain opinions or comments about products and/or services and to conduct other research and development;
- to record statistical data for marketing analysis and to conduct market research;
- for our internal business purposes, including to assess the performance of our Websites and to improve the operation of our Websites and our other products and services;
- to display content and advertising that is customised to your interests, preferences and experiences;
- to provide data matching and targeted advertising services;
- to inform you of changes to our Websites, or our business, or to the content and other things available from the Websites;
- to update our records and keep your contact details up to date;
- to provide your updated personal information to our related bodies corporate, contractors, service providers and other trusted third parties;
- to process and respond to any enquiry or complaint made by you;
- where there is reason to suspect unlawful activity has been engaged in, to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country;
- to conduct appropriate checks for credit-worthiness and for fraud;
- to administer and maintain our relationship with you;
- for the purposes stated in any collection statement on a particular Collection Channel; and
- any other purpose as may be deemed reasonably necessary by Nova Entertainment in the circumstances.

9.2 Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

## **10. WHAT HAPPENS IF WE CAN'T COLLECT YOUR PERSONAL INFORMATION**

10.1. If you do not provide us with the personal information described above, some or all of the following may happen:

- we may not be able to provide you with access to some or all of the Websites;
- we may not be able to provide you with your requested products and services;
- we may not be able to provide you with information about our products and services;

- you may not be able to enter a promotion or competition;
- we may not be able to respond promptly to your query or comment;
- we may not be able to respond promptly to your complaint;
- we may not be able to consider you for employment opportunities at Nova Entertainment;
- we may not be able to send newsletters and other communications to you; and
- we may be unable to tailor the content of our Websites to your preference and your experience of our Websites may not be as enjoyable or useful.

## **11. WHEN WE DISCLOSE YOUR PERSONAL INFORMATION**

- 11.1. We may disclose your personal information to our employees and related bodies corporate and to various outside organisations (some of which may be located in foreign countries). Except as permitted under the APPs, we will only disclose your personal information for one of the purposes set out in part 9.1 above.
- 11.2. Some of the outside organisations we may disclose your personal information to include:
- our contractors or service providers involved in the operation and management of our business and our Websites, including market research companies, web hosting providers, IT service providers, ad targeting companies, electronic network administrators, debt collectors, credit reporting and fraud checking agencies and professional advisors such as accountants, solicitors, business advisors and consultants;
  - suppliers, advertisers, sponsors, promotional partners and other trusted third parties with whom we have commercial relationships, for business, marketing, and related purposes;
  - your representatives, including your legal advisers;
  - government and regulatory authorities, including the Australian Communications and Media Authority;
  - organisations that purchase all or part of our assets or businesses; and
  - any organisation for any authorised purpose with your express consent.
- 11.3. We may combine or share any information that we collect from you with information collected by any of our related bodies corporate.
- 11.4. Nova Entertainment recognises the trust with which you provide personal information, and except as stated in this Privacy Policy or as is otherwise lawful, such information will not be used or disclosed for any other purposes without consent. However, Nova Entertainment reserves the right to use or disclose any information, including personal information, as needed to satisfy any law,



regulation or legal request, to protect the rights or property of Nova Entertainment, any member of the Nova Entertainment group, or any member of the public, to protect the integrity of a Website, to fulfil your requests, or to cooperate in any law enforcement investigation or an investigation on a matter of public safety.

## **12. DIRECT MARKETING MATERIALS**

- 12.1. We may send you direct marketing communications and information about our products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the *Spam Act 2003 (Cth)*. You consent to us sending you those direct marketing communications by any of those methods. If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. In addition, at any time you may opt-out of receiving marketing communications from us (including direct marketing communications) 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.
- 12.2. Despite removing your name from the database, preventing you from receiving future advertising and marketing information, Nova Entertainment may send you non-commercial "Administrative Emails". Administrative Emails relate to a Nova Entertainment user account and may include administrative and transaction confirmations, requests and inquiries or information about a particular Nova Entertainment user account. If you do not wish to receive such communications from Nova Entertainment, you may remove your name from the database by utilising the functional unsubscribe facility.
- 12.3. We may also provide your personal information to other organisations for the purposes of direct marketing, where you have provided consent for us to do so.

## **13. ABILITY OF OTHERS TO VIEW INFORMATION**

- 13.1. Nova Entertainment may provide areas on a Website where you can upload user-generated content, post or provide information about yourself, communicate with other users, provide reviews for content, products and/or services or interact with or vote on particular content. This information may be shared with others and may be publically posted on our Websites, including without limitation, social media platforms and other public forums in which you choose to participate. This information may become publically available and may be read, collected and used by others outside of our Websites. Nova Entertainment is not responsible for the conduct of others who may read, collect and use this information.
- 13.2. When you register as a member of any of our Websites, some information about your account (such as your user name) may be publicly available on our Websites when you contribute content to our Websites, or participate in any of our Websites

forums or chat rooms. If you choose to include any personal information about yourself in any content that you contribute to any of our Websites, that information will be available and accessible to other users of our Websites anywhere in the world.

- 13.3. You must not include any personal information about other people in any content that you contribute to any of our Websites, unless such people have expressly consented to you including their personal information in such content and to you providing the content to us for use on our Websites.

#### **14. OVERSEAS DISCLOSURE**

- 14.1. We may disclose personal information to our related bodies corporate, third party suppliers, service providers and other trusted third parties who may be located (or have facilities located) outside Australia, for some of the purposes listed above. The countries in which these organisations are located will depend on the circumstances.
- 14.2. We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.
- 14.3. In the ordinary of course of business, we may disclose your personal information to entities located outside of Australia, including our related bodies corporate, located in countries including, but not limited to, the United Kingdom.

We also use data hosting companies and other IT service providers, such as Amazon Web Services, therefore your information may be transferred to and stored on servers in various locations both in and outside of Australia, including, but not limited to, Singapore and Hong Kong.

#### **15. HOW YOU CAN ACCESS AND CORRECT YOUR PERSONAL INFORMATION**

- 15.1. You have a right to access any personal information we hold about you at any time, subject to some exceptions allowed by law. If you would like to do so, please let us know by contacting our Privacy Officer (see details below). For security reasons, we may ask you to put your request in writing.
- 15.2. We may charge a fee for searching for and providing access to your information, to cover our administrative and other reasonable costs. We will not charge for simply making the request and will not charge for making any corrections to your personal information.
- 15.3. There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting

access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

## **16. HELP US TO ENSURE WE HOLD ACCURATE INFORMATION**

- 16.1. We take reasonable steps to ensure that the personal information we collect, store, use and disclose is accurate, complete and up-to-date. However, the accuracy of the information we hold depends to a large extent on the information you provide. If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, please contact Nova Entertainment's Privacy Officer (see details below).
- 16.2. If you are a member of any Website, you can access, change and update your membership profile at any time by logging into your membership account via the relevant Website.
- 16.3. You may also request that we delete personal information about you, and should you make such a request, all reasonable steps to delete the information will be made, except where it is required for legal reasons. Deletion of information may result in Nova Entertainment being unable to facilitate or provide you with access to, and receipt of, content on a Website, other content, services or product information, upcoming promotion, competition or event information, and/or provide certain content, goods or services.
- 16.4. We are not responsible for removing your personal information from the lists of any third party who has previously been provided your information in accordance with this Privacy Policy.

## **17. PREVENTING UNAUTHORISED ACCESS TO YOUR PERSONAL INFORMATION**

- 17.1. We will take reasonable steps to maintain the security of, and to prevent unauthorised access to, modification of, or disclosure of, your personal information. We may hold your information in either electronic or hard copy form. Personal information is destroyed or de-identified when no longer needed.
- 17.2. As our Websites are linked to the Internet, and the Internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the Internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

## **18. LINKED SITES**

- 18.1. Our Websites may contain links to other Internet Websites. These links are provided solely for your convenience. Their inclusion cannot be taken to imply any endorsement or validation by us of the content of the third party website.
- 18.2. If you submit personal information to or via any linked site, the privacy principles applying to that information will be outside our control. You should therefore check the privacy statement of the linked site before submitting information to or via that site. Nova Entertainment is not responsible, nor does it accept any liability, for the conduct of companies linked to our Websites.
- 18.3. We may also use third party advertisements on our Websites. All third party advertising, if paid for, is paid for by the relevant third party advertisers and are not recommendations or endorsements by Nova Entertainment or any of its affiliates. Nova Entertainment is not responsible for the content (including representations) of any third party advertisement on a Website. Cookies may be associated with these advertisements to enable the advertiser to track the number of anonymous users responding to the campaign. We do not have access to or control of cookies placed by third parties.

## **19. SALE OF THE COMPANY**

- 19.1. If Nova Entertainment merges with, or is acquired by, another company, or sells all or a portion of its assets, your personal information may be disclosed to our advisers and any prospective purchaser's adviser. However, personal information will always remain subject to this Privacy Policy.

## **20. MAKING A COMPLAINT**

- 20.1. If you would like to make a complaint about our collection, storage, use or disclosure of personal information, or if you believe that we have not complied with this Privacy Policy or the Privacy Act, please contact our Privacy Officer in writing using the details below.
- 20.2. When contacting us please provide us with as much detail as possible in relation to your complaint.
- 20.3. We will take any privacy complaint seriously and any complaint will be assessed by our Privacy Officer with the aim of resolving any issue in a timely and efficient manner. We request that you cooperate with us during this process and provide us with any relevant information that we may need.
- 20.4. If you are not satisfied with the outcome of our assessment of your complaint, you may refer your query, problem or complaint to the Office of the Australian Information Commissioner via the contact details listed at <http://www.oaic.gov.au/about-us/contact-us-page>.

## **21. HOW TO CONTACT US**

- 21.1. If you have any questions or complaints in relation to privacy, please contact our Privacy Officer by using the contact, feedback or complaint link on our Websites, or contact our Privacy Officer using the details set out below.
- 21.2. We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in a timely and appropriate manner.

Please contact our Privacy Officer at:

Privacy Officer

Nova Entertainment Pty Ltd

Level 5, 33 Saunders Street,

Pymont NSW 2009

**Telephone:** (02) 9564 9999

**Email:** [privacy@novaentertainment.com.au](mailto:privacy@novaentertainment.com.au)

## **22. CHANGES TO OUR PRIVACY POLICY**

- 22.1. From time to time, we may need to change this Privacy Policy to reflect our changing business practices, changing legislation and best practice. We may therefore change this Privacy Policy at any time by posting the changed Privacy Policy on our Websites without notice. We encourage you to check this Privacy Policy from time to time.
- 22.2. All personal information collected and held by us will be governed by our most recent Privacy Policy, as posted on our Websites.

This Privacy Policy was last updated December 2014.

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## **ANNEXURE A**

### **1. JOURNALISM EXEMPTION TO THE PRIVACY ACT**

The Privacy Act seeks to balance the public interest in providing adequate safeguards for the handling of personal information and the public interest in allowing a free flow of information to the public through the media.

The Privacy Act exempts acts done by a media organisation such as Nova Entertainment in the course of journalism provided that at the time of the act, the media organisation is publicly committed to observe standards that deal with privacy in the context of the activities of the organisation and those standards are published in writing by the organisation or a person or body representing a class of media organisations.

Nova Entertainment has developed the Journalism Privacy Standards set out below and is publicly committed to observe these Standards. Accordingly, Nova Entertainment is exempt from complying with the APPs in respect of its journalism activities.

## **2. DEFINITIONS**

"Personal information" in these Journalism Privacy Standards means information which identifies you as an individual or which renders you reasonably identifiable.

"We", "us" and "our" means Nova Entertainment Pty Ltd (ABN 75 093 553 989) and its related bodies corporate and their respective officers and employees.

## **3. APPLICATION OF THE JOURNALISM PRIVACY STANDARDS**

These standards apply to collection, use and disclosure of personal information by us in the course of our journalism activities.

## **4. COLLECTION OF PERSONAL INFORMATION**

We will collect personal information only where it is in the public interest to do so.

We will respect an individual's right to protection from unwarranted invasions of privacy.

Our journalists may collect personal information without revealing their identity where it is in the public interest to do so.

We will respect the private grief of individuals.

## **5. USE OF PERSONAL INFORMATION**

Personal information will only be used for the purpose for which it was collected or a directly related and reasonable secondary purpose.

Personal information obtained by unfair means will not be broadcast or otherwise disclosed unless there are overriding public interest considerations.

We will not intrude into the privacy of public figures unless the intrusion is related to the individuals' public role or activities or there are overriding public interest considerations.

## **6. SENSITIVE INFORMATION**

We will not place any gratuitous emphasis sensitive personal information, except where it is relevant and in the public interest to report and express opinions in these areas. Members of the public caught up in newsworthy events will not be exploited.

Unless otherwise restricted by law or court order, open court hearings are matters of public record and may be reported. Such reports will be fair and balanced. They will not identify relatives or friends of people accused or convicted of crime unless the reference to them is necessary for the full, fair and accurate reporting of the crime or subsequent legal proceedings.

**7. QUALITY AND ACCURACY OF PERSONAL INFORMATION**

We will take reasonable steps to ensure that personal information we collect, use or disclose is accurate, complete and up-to-date.

**8. SECURITY OF PERSONAL INFORMATION**

We will take reasonable steps to protect personal information we hold from misuse and loss and from unauthorised access, modification or disclosure.

**9. CONFIDENTIAL SOURCES**

Where it is lawful to do so, we may refuse to do anything which could reveal the identity of a person who gave us personal information in confidence. Where it is lawful to do so and where there are no overriding public interest considerations, we will attempt to ensure that any personal information which we broadcast or otherwise disclose does not identify the source of the information if the information was provided to us in confidence.

**10. CORRECTION**

Where personal information which is materially inaccurate is broadcast or otherwise disclosed, we will take reasonable steps to rectify the disclosure.

**11. CODES OF PRACTICE**

The Commercial Radio Codes of Practice registered by the Australian Broadcasting Authority also impose some relevant privacy obligations on us. We are committed to complying with these Codes of Practice.

**12. PRIVACY OFFICER**

If you have any concerns, complaints or questions, please contact our Privacy Officer via email: [privacy@novaentertainment.com.au](mailto:privacy@novaentertainment.com.au).