

## Privacy Policy

**Gravity Media (Australia) Pty Ltd, trading as Gravity Media** ("We", "Us", "Our") are committed to protecting and respecting your privacy. Gravity Media Holdings Limited issues this statement on behalf of its group of companies that trade under Gravity Media.

This Privacy Policy (together with our [terms of use](#) and any other documents referred to) the **Policy**, sets out the basis on which we process any Personal Information we collect from you, or that you provide to us. Please read the following carefully. By visiting [www.gravitymedia.co.uk](http://www.gravitymedia.co.uk) (**our site**) you are accepting and consenting to the practices described in this Policy.

We protect your privacy in line with the Commonwealth Privacy Act 1988 (Privacy Act), including the Australian Privacy Principles (APPs) and the Australian Government Agencies Privacy Code ("Data Protection Legislation"). If you have any queries relating to Our use of your Personal Information or any other related data protection questions, please contact Our data protection team by using the following email address: [grp-uk-data\\_protect@gravitymedia.com](mailto:grp-uk-data_protect@gravitymedia.com).

Our site may, from time to time, contain links to and from the websites of, third parties, our partner networks, advertisers and affiliates, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any Personal Information to these websites.

### The data we collect about you

Personal Information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of Personal Information about you which we have grouped together follows:

- Identity Data includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- Contact Data includes billing address, delivery address, email address and telephone numbers.
- Financial Data includes bank account and payment card details.



- Transaction Data includes details about payments to and from you and other details of products and services you have purchased from us.
- Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Profile Data includes purchases or orders made by you, your interests, preferences, feedback and survey responses.
- Usage Data includes information about how you use our website, products and services.
- Marketing and Communications Data includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your Personal Information but is not considered Personal Information in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a

specific website feature. However, if we combine or connect Aggregated Data with your Personal Information so that it can directly or indirectly identify you, we treat the combined data as Personal Information which will be used in accordance with this privacy notice.

We do not collect any Special Categories of Personal Information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

### **How do we collect data**

We use different methods to collect data from and about you including through:

Direct interactions. You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise.

This includes Personal Information you provide when you:

- apply for our products or services;

- create an account on our website;
- subscribe to our service or publications;
- request marketing to be sent to you;
- Your contact with us, such as via an email or letter sent, or through our chat platform;
- enter a competition, promotion or survey; or
- give us some feedback.

Automated technologies or interactions. As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this Personal Information by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our [cookie policy](#) for further details.

This website is using Tidio, a chat platform that connects users with the customer support of Gravity Media. We are collecting email addresses, names, and region location, only with the consent of the users, in order to start the chat. The messages and data exchanged are stored within the Tidio application. For more information, please refer to their Privacy Policy. Gravity Media is not making use of these messages or data other than to follow up on users' registered issues or inquiries. Your personal data will be processed and transmitted in accordance with Data Protection Legislation.

Third parties or publicly available sources. We may receive Personal Information about you from various third parties and public sources as set out below:

- Technical Data from the following parties: analytics providers, advertising networks and search information providers, based inside and outside the EU.
- Contact, Financial and Transaction Data from providers of technical, payment and delivery services.
- Identity and Contact Data from data brokers or aggregators and from publicly available sources based inside the EU.

## **How we use your Personal Information**

We will only use your Personal Information when the law allows us to. Most commonly, we will use your Personal Information in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally, we do not rely on consent as a legal basis for processing your Personal Information other than in relation to sending third party direct marketing communications to you via email or text message or in relation to the use of our chat platform. You have the right to withdraw consent to marketing at any time by contacting us.

### **Data retention**

We will only keep your Personal Information for as long as We are either required to do so by law, or as is required to fulfil the purposes for which it was collected.

We maintain a data retention policy to meet Our data protection obligations in this respect. Please contact Our data protection team by using the following email address: [grp-uk-data\\_protect@gravitymedia.com](mailto:grp-uk-data_protect@gravitymedia.com) or any questions or information which you may have in this regard.

### **Data security**

We have put in place appropriate security measures to prevent your Personal Information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your Personal Information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Information on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected Personal Information breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **Cookies**

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and

also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our [Cookie Policy](#).

## **Marketing**

We strive to provide you with choices regarding certain Personal Information uses, particularly around marketing and advertising.

### **Promotional offers from us**

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have opted in to receiving such communications when you have requested information from us or purchased goods or services from us or if you provided us with your details when you entered a competition or registered for a promotion.

### **Third-party marketing**

Gravity Media Holdings Limited is part of the Gravity Media companies. We will get your express opt-in consent before we share your Personal Information with any company outside of the Gravity Media companies for marketing purposes.

### **Opting out**

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by contacting us at any time.

Where you opt out of receiving these marketing messages, this will not apply to Personal Information provided to us as a result of a product/service purchase, warranty registration, product/service experience or other transactions.

### **Disclosure of your information**

You agree that we have the right to share your personal information with:

- Any other company within Gravity Media.
- Selected third parties including: business partners, suppliers and sub-contractors for the performance of any contract we enter into with you,

analytics and search engine providers that assist us in the improvement and optimisation of our site; and credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

- If Gravity Media (Australia) Pty Ltd is acquired by a third party, we will disclose your Personal Information to the prospective seller or buyer.
- If we are under a duty to disclose or share your Personal Information in order to comply with any legal obligation, or in order to enforce or apply our [terms of use](#) or terms and conditions of supply and other agreements; or to protect the rights, property, or safety of Gravity Media (Australia) Pty Ltd, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

We require all third parties to respect the security of your Personal Information and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Information for their own purposes and only permit them to process your Personal Information for specified purposes and in accordance with our instructions.

### **Where we store your Personal Information**

The data that we collect from you will be transferred to, and stored at, a destination outside the European Economic Area ("**EEA**").

In the course of carrying out the activities referred to above , We will take steps to ensure that your Personal Information is adequately protected in accordance with the applicable data protection legal requirements.

All information you provide to us is stored on our secure servers.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Information, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

### **Your rights to:**

You have the following specific rights in respect of the Personal Information which We process:

1. **Request access** to your Personal Information. This enables you to receive a copy of the Personal Information we hold about you and check that we are lawfully processing it.
2. **Request correction** of the Personal Information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
3. **Request erasure** of your Personal Information. This enables you to ask us to delete or remove Personal Information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Information where you have exercised your right to object to processing (see below).
4. **Object to processing** of your Personal Information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your Personal Information for direct marketing purposes.
5. **Request the restriction of processing** of your Personal Information. This enables you to ask us to suspend the processing of Personal Information about you, for example if you want us to establish its accuracy or the reason for processing it.
6. **Request the transfer** of your Personal Information to another party.

If you want to review, verify, correct or request erasure of your Personal Information, object to the processing of your Personal Information, or request that we transfer a copy of your Personal Information to another party, please contact the DPO in writing on [grp-uk-data\\_protect@gravitymedia.com](mailto:grp-uk-data_protect@gravitymedia.com).

### **Contact details**

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO by [grp-uk-data\\_protect@gravitymedia.com](mailto:grp-uk-data_protect@gravitymedia.com). Any changes we make to this Policy in the future will be posted on this page. Please check back frequently to see any updates or changes to our Policy.

You have the right to make a complaint at any time to Office of the Australian Information Commissioner (OAIC), the Australian supervisory authority for data protection issues.

**Updates to this policy**

This policy will be kept under continual review, and changes may be made from time to time. Updated on:

09 March 2023