

Magnifico Music

PRIVACY POLICY

Magnifico Music Pty Ltd ACN 631 031 813 (**Magnifico Music**) is committed to providing quality services to you. We value your privacy and are committed to protecting your Personal Information.

I. PURPOSE

The following Privacy Policy (**Policy**) will outline the ways in which Magnifico Music will collect, hold, use and disclose Personal Information that Magnifico Music holds about you.

This Policy outlines our ongoing obligations to you in respect of how Magnifico Music manages your Personal Information. By utilising our website, services or otherwise providing Magnifico Music with your Personal Information, you consent to Magnifico Music holding, using and disclosing your Personal Information as described in this Policy.

Please note that we have adopted the Australian Privacy Principles (**APPs**) contained in the *Privacy Act 1988* (Cth) (the **Privacy Act**). The APPs govern the way in which entities collect, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at: www.oaic.gov.au.

II. WHAT IS PERSONAL INFORMATION AND WHY DO WE COLLECT IT?

Personal Information is information or an opinion that identifies an individual. The Personal Information Magnifico Music may collect includes but is not limited to:

- your name(s);
- your title;
- your postal address;
- your email address(es);
- your phone number(s);
- facsimile number(s);
- identification and background information provided during enrolment;
- financial information including bank account details and credit or debit card details; and
- other relevant contact information.

(Personal Information)

Magnifico Music may collect Personal Information about you in several methods. Personal Information is obtained in many ways including:

- during initial enrolment meetings;
- by correspondence;

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- by telephone;
- enrolment forms;
- by email;
- via our website;
- from media and publications;
- from other publicly available sources;
- from cookies;
- payment forms; and
- from third parties.

Magnifico Music does not guarantee website links or policies of authorised third parties.

Magnifico Music may also conduct and hold Personal Information which may be deemed sensitive information under the Privacy Act. However, Magnifico Music collects your Personal Information for the primary purpose of providing its services to you, providing information to its clients and marketing. Magnifico Music may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure.

When Magnifico Music collects Personal Information, it will, where appropriate and where possible, explain to you why the information is being collected and how it may be used.

a) Sensitive Information

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will be used by Magnifico Music only:

- for the primary purpose for which it was obtained;
- for a secondary purpose that is directly related to the primary purpose; and
- with your consent; or where required or authorised by law.

b) Third Parties

Where reasonable and practicable to do so, Magnifico Music will collect your Personal Information only from you. However, in some circumstances Magnifico Music may be provided with information by third parties. In such a case, Magnifico Music will take reasonable steps to ensure that you are made aware of the information provided by the third party.

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c) Disclosure of Personal Information

Your Personal Information may be disclosed in a number of circumstances including but not limited to the following:

- third parties where you consent to the use or disclosure; and
- where required or authorised by law.

III. SECURITY OF PERSONAL INFORMATION:

Magnifico Music will take reasonable steps to protect the security of all Personal Information. Magnifico Music is required to respect the confidentiality of Personal Information and the privacy of individuals and has adopted reasonable steps to protect Personal Information from misuse and loss and from unauthorised access, modification or disclosure; for example, by restricting access of electronic records to only appropriate staff members. If Magnifico Music no longer requires your Personal Information, Magnifico Music may take reasonable steps to remove or destroy it.

In order to prevent unauthorised access or disclosure, Magnifico Music has incorporated proper technical, physical and managerial procedures to safeguard and protect your personal data. Magnifico Music regularly monitors its system for possible vulnerabilities and attacks and has measures in place to identify further methods to strengthen security.

Magnifico Music limits access to Personal Information to those employees, consultants, contractors and other third parties on a strict “need to know” basis. Magnifico Music has procedures in place to identify and respond to data security breaches and will notify you and any data protection authority of a breach where Magnifico Music is legally required to do so.

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure.

When your Personal Information is no longer needed for the purpose for which it was obtained, Magnifico Music may take reasonable steps to destroy or permanently de-identify your Personal Information.

IV. HOW DO WE HOLD PERSONAL INFORMATION?

We may store your confidential Personal Information or data through software programs where your Personal Information may be stored in data centres that are located locally in Australia as well as other locations around the globe.

We hold Personal Information in hardcopy files and in electronic form. We take reasonable steps to protect Personal Information from misuse, interference loss and unauthorised access.

We store hardcopy files in our offices and filing systems within an access-controlled premises. Under our records managements system, access to files is appropriately limited. We may apply additional security measures limiting access to information about files or store files in locked cupboards or other means of restricted access rooms as necessary or desirable based on your needs.

We store electronic records within our own secure network and through third party data storage providers. Personal Information within our network is password protected and access is strictly limited.

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Our third-party data storage providers are required to protect Personal Information in accordance with applicable laws and legislations. They are required to take appropriate technical and organisation measures against unauthorised or unlawful use of Personal Information or its accidental loss, destruction or damage.

V. PURPOSES WE COLLECT, HOLD, USE AND DISCLOSE PERSONAL INFORMATION:

We collect, hold, use and disclose your Personal Information for a number of reasons. These include, but are not limited to:

- providing the services that our clients have requested;
- managing our relationship with you, including:
 - providing services;
 - responding to enquiries; and
 - obtaining payment for our services.
- meeting legal or other regulatory obligations imposed on us;
- auditing and managing the usage of our website;
- to keep your contact details updated;
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or other governmental authority; and
- to otherwise carry out our functions.

We may also use and/or disclose your Personal Information for other purposes which you consent to or which are required or permitted by law. This may include for a secondary purpose that is related to the original purpose for which we collected it.

VI. WHO WE DISCLOSE YOUR PERSONAL INFORMATION TO:

Magnifico Music may share your Personal Information with third parties in the course of providing our services. These include, but are not limited to:

- our employees, related entities, substitutes, contractors or third-party service providers whose services have a connection to the services we provide;
- our insurers and our professional advisors. These include:
 - our accountants;
 - business advisors;
 - legal advisors; and
 - auditors.

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- any industry regulatory bodies; and
- any other organisation or individual for any authorised purpose with your consent.

VII. PERSONAL INFORMATION ABOUT OTHER PEOPLE WHICH YOU PROVIDE TO US:

If you provide personal data to us about a different individual, other than yourself, you must ensure that you are entitled to disclose that personal data to us. In particular, you must ensure the individual concerned is aware of the various matters detailed in this Privacy Policy, as those matters relate to that individual, including our identity, how to contact us, our purposes of collection, our personal data disclosure practices (including disclosure to overseas recipients), the individual's right to obtain access to the personal data and make complaints about the handling of the personal data, and the consequences if the personal data is not provided (such as our inability to provide services).

VIII. ARE WE LIKELY TO DISCLOSE YOUR PERSONAL INFORMATION OUTSIDE OF AUSTRALIA?

We may disclose Personal Information to third-party suppliers and service providers located overseas for some of the purposes listed above.

This may include countries which do not provide the same level of protection as the laws of Australia. We will ensure that any such international transfers are made subject to appropriate or suitable safeguards that are relevant and required to each country where the information is being sent to.

Magnifico Music will always ensure a level of data protection at least as protective as that required in Australia. We will also require our agents, consultants and sub-contractors and others who are outside Australia and to whom we transfer your personal data to ensure a similar level of data protection.

IX. WHAT HAPPENS IN THE EVENT THAT YOUR PERSONAL INFORMATION GETS BREACHED?

In the event of a data breach or suspected breach causing serious harm, Magnifico Music will respond as set forth below:

1. immediately conduct a thorough investigation to determine whether the breach or the suspected breach is likely to cause serious harm to you and other clients of Magnifico Music;
2. where appropriate, immediately report the breach or suspected breach to Office of the Australian Information Commissioner (**OAIC**) through their online portal;

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3. notify you in a timely manner as to the nature of the breach or suspected breach, what data was or could be compromised, how it may affect you and our recommendations to minimise further or potential breach (i.e. change of passwords, etc);
4. immediately conduct a thorough internal investigation together with IT security consultants and provide OAIC and you with a copy of this report;
5. pursuant to OAIC's recommendation and requirements, publish a statement on a public platform (i.e. newspapers, website etc) regarding the breach and the details thereof if determine to have caused serious harm (if required);
6. work closely with our IT security consultants to mitigate or minimise the breach and its subsequent effects; and
7. work closely with out IT security consultants to implement measures in place to ensure similar breaches do not occur in the future.

X. YOUR RIGHTS:

a) Access to your Personal Information and right to rectification

You may access the Personal Information we hold about you and update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing.

Magnifico Music will not charge any fee for your access request but may charge an administrative fee for providing a copy of your Personal Information.

In order to protect your Personal Information, we may require identification from you before releasing the requested information.

b) Right to remove data

You can ask us to delete or remove your information in certain circumstances. In cases where we are processing your personal data based on our legitimate interests, you can ask us to stop processing your data for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

c) Right to object

In certain circumstances, you have a right to object to privacy-related actions being carried out by us. Where personal data is being processed for direct marketing purposes, you have a right to object at any time.

XI. MAINTAINING THE QUALITY OF YOUR PERSONAL INFORMATION:

It is important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up to date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

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XII. MAKING A PRIVACY-RELATED COMPLAINT:

If you would like to complain about a breach of the Australian Privacy Principles, you may contact our Privacy Officer at the details below.

Complaints are generally investigated, and a response provided to the complainant within twenty-one (21) business days.

If you disagree with the decision, you may refer your complaint to the Office of the Australian Information Commissioner by:

- visiting: www.oaic.gov.au;
- calling: 1300 363 992; or
- by emailing: enquiries@oaic.gov.au.

a) Privacy Officer

If you would like:

- further information about the methods we manage personal information; or
- to request access to your personal data; or
- amend the details of your personal data; or
- wish to make a complaint,

please contact our Privacy Officer by either:

- **Email:** admin@magnificomusic.com.au
- **Post:** 7/83 Doggett Street, Newstead QLD, 4006
- **Telephone:** 0414 179 167

XIII POLICY UPDATES

Magnifico Music reserves the right to update and change this Privacy Policy from time to time to reflect any changes in the way we process your personal data or to meet any of our changing legal requirements. We may notify you about changes to this Privacy Policy by posting an updated version on our website. We encourage you to check our website from time to time to ensure you are familiar with our latest Privacy Policy.

XIV PRIVACY POLICY COMPLAINTS AND ENQUIRIES

If you have any queries or complaints about our Privacy Policy, please contact us at:

Magnifico Music
7/83 Doggett Street
Newstead, 4006

Magnífico Music

admin@magnificomusic.com.au

www.magnificomusic.com.au

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