

RCJ GROUP - PRIVACY POLICY

IMPORTANT LEGAL NOTICE

In this policy:

- “**RCJ**” means Russell Curtis & Janes Advertising Pty Ltd ABN 15 005 856 575 (T/A RCJ Media; RCJ Media Group; Media Credit Australia; and Media Buying Services) and, where applicable, any of the other entities within the RCJ Group which supplies goods and/or services to you (whether or not that fact is disclosed).
- “**RCJ Group**” means, collectively, RCJ and each of the following entities and their successors and assigns:
 - Leapfrogger Pty Ltd ABN 91 607 722 109; and
 - Brand Asia Pty Ltd ABN 72 666 692 119,together with any additional entities that become subsidiaries of RCJ from time to time.
- “**We**” and “**Us**” means RCJ and “**Our**” means belonging or pertaining to Us.

We are committed to protecting your privacy. This policy sets out Our privacy policy (**Privacy Policy**), outlines the information that We collect from you, how We use such information and your rights.

We are committed to managing personal information in accordance with the Australian Privacy Principles under the *Privacy Act 1988* (Cth), the General Data Protection Regulation (EU) 2016 / 679 (**GDPR**) and in accordance with all other applicable privacy laws.

Please read this Privacy Policy carefully as it sets out how We can use your personal information submitted via Our websites (www.rcj.com.au; www.leapfrogger.com.au and www.brandasia.com.au) (**Websites**). By continuing to submit your personal information to Us via any Website, you consent to Us collecting, using and disclosing such personal information in accordance with the terms of this Privacy Policy. If you do not accept this Privacy Policy, you should cease using the Websites immediately.

We reserve the right to amend this Privacy Policy from time to time and We may give you notice of any amendments by publication on a Website or by some other means of notification. You will be deemed to have had knowledge of such amendments and to have accepted this Privacy Policy as amended if you continue to access a Website after amendment of this Privacy Policy.

For the avoidance of doubt, this Privacy Policy is deemed to be a written agreement between Us and you and in the event of any conflict with RCJ’s Terms and Conditions of Trade which can be accessed at [\[link to be confirmed\]](#), this Privacy Policy will prevail.

WHAT PERSONAL INFORMATION DO WE COLLECT?

When you use a Website, We may collect the following information from you:

- Your name
- Your contact information, such as your email address
- Your date of birth
- Your gender

We may also collect information automatically when you use a Website, for example what type of device or browser you are using (for recording potential errors with a Websites). We use cookies with the Websites, which we explain below.

WHY DO WE STORE YOUR PERSONAL INFORMATION?

We collect information primarily to facilitate the provision of Our services.

Some of the reasons We store your information include to:

- create and manage your account;
- enable you to be logged into a Website between uses;
- provide services to you;
- record data and analytics that allow Us to improve Our Websites;
- fulfil Our reporting obligations to any regulatory bodies;
- properly perform Our obligations to you in providing any goods or services; and
- maintain accounts records, tracing and verification in accordance with Our security procedures.

While most of Our data in relation to you comes from collecting it directly from you, We may from time to time work with third parties who assist Us in Our business. Your data is protected by their relevant privacy policies and We take steps to ensure that any data We collect is in line with relevant legislation and best practice.

WHEN DO WE COLLECT YOUR PERSONAL INFORMATION?

We collect your personal information when you use a Website, when you use Our services and when you interact with Us via phone, email or in person.

Examples of when We collect your personal information include:

- when you access a Website;
- when you create and manage your account on a Website;
- when you submit or complete forms using a Website; and
- when you contact Us via phone, email, letter or in person.

WHAT HAPPENS WHEN WE'RE UNABLE TO COLLECT YOUR PERSONAL INFORMATION?

If We are unable to collect your personal information, We may not be able to fulfil Our obligations to you including providing services. Your experience when interacting with Us may be delayed or not as efficient as you would like.

HOW DO WE STORE YOUR PERSONAL INFORMATION?

We take every effort to store your personal information safely. We hold your personal information in electronic form. When We store information electronically, this may be on Our computer systems, databases, software programs, internet servers and hosted internet solutions. We take every effort to keep your information safe in accordance with relevant government regulation and requirements. Our servers, computer systems and internet hosting are protected through necessary security systems including physical locks, firewalls, security systems and passwords.

HOW WE USE YOUR DATA

We do not sell your personal information to other third parties. However, We may share some of your data with Our third-party partners in the provision of the agreed services with your consent. When this is done, Our partners are obligated to only use your data for the reasons agreed with Us and have committed to not misuse or sell your data in any way. Your personal data may be shared to the following partners:

- Our employees, contractors or service providers to the extent necessary to provide services to you;
- Our business advisors including accountants, lawyers and other business professionals where reasonably required for them to fulfil their obligations to Us; or
- if required by law, to any person or body authorised by such law.

Your personal information may be disclosed to third parties if such disclosure is required by law. If We sell Our business, or We have a change in control, your personal information will be disclosed and transferred to the new owner/controller for that purpose.

We do not use your personal information for marketing purposes.

We are not liable for any loss, damage or claim arising out of a third party's use of your personal information where We were authorised by you or law to provide that third party with your personal information.

HOW YOU CAN ACCESS YOUR PERSONAL INFORMATION

You have the right to access your personal information stored by Us at any time. Please contact Us via Our privacy contact officer at the details below (**Privacy Contact Officer**) to make this request. Please note that it may take Us a few days to collate all the personal information We have stored.

You have the right to be informed about how your personal information is being used and You may contact the Privacy Contact Officer at any time to ask questions about your personal information, or to update your details.

HOW LONG DO WE STORE YOUR PERSONAL INFORMATION?

We retain your personal information indefinitely in order to fulfil Our obligations to you, for example to provide services, until you request Us to delete it. We may also need to store your personal information to comply with any governing bodies. Please note that We may have a legal obligation to retain copies of your information in certain circumstances for a particular period of time.

DO WE DISCLOSE YOUR PERSONAL INFORMATION OVERSEAS?

We are based in Australia so the majority of Our service providers are Australian based. We only ever disclose your personal information outside the jurisdiction it was collected where We are permitted to do so under all applicable privacy laws and we take all necessary steps to keep your information safe as required under such laws.

RESIDENTS IN THE EUROPEAN ECONOMIC AREA

If you are a resident of the European Economic Area, you are protected by specific regulations set out in the GDPR which includes the following:

- You have the right to access your personal information at any time and to enquire exactly what information We are holding about you.
- You have the right to rectify or change your personal information at any time.
- You have the right to request deletion of your personal data at any time unless We are required to hold your data for legal or regulatory reasons.
- You also have the right to restrict whatever personal information We hold about you.
- You have the right to request the transfer of your data to a relevant third party.
- You have the right to object to your personal information being used in a way that you do not like and request that We stop doing so. We will fulfil your request unless there is a legal or regulatory reason not to.
- You have the right to make a privacy complaint if you feel We are misusing your data. We will respond in the same way as We will for residents of any other country as set out in this Privacy Policy.

COOKIES AND WEB BROWSING

Like many websites, the Websites use cookies to personalise and streamline your browsing experience with Us. This is because We want to provide you with the best and easiest experience possible when you're using the Websites.

What types of cookies do We use?

We require certain types of cookies in order for a Website to operate, including to keep your login state active between uses and to record potential errors.

What can you do to control your cookies?

You have the choice to customise your use of cookies through your browser, for example Firefox, Google Chrome or Internet Explorer. You can set your cookies as either prompted or refused. Please note that if you deactivate your cookies, you may have difficulty using Our Websites or services correctly.

UNSOLICITED PHONE CALLS OR EMAILS

We only contact existing customers in relation to an existing account or enquiry made with Us. We may contact you for marketing purposes where you have given Us permission to do so.

Any communication from Us via email will only ever be made from one of Our authorised email users and will only ever carry one of the following suffices: @rcj.com.au; @leapfrogger.com.au; or @brandasia.com.au.

Should you receive an email stating it is from Us but the email comes from another email address, or if you suspect a phone call you received may be suspicious, please inform Us separately by writing or by phone immediately but do not acknowledge or respond directly to the suspicious communication.

COMPLAINTS AND THE PRIVACY CONTACT OFFICER

If you believe We have breached your privacy rights at any time, please contact the Privacy Contact Officer at the following address:

*RCJ Corporate Office
PO Box 2161, Oakleigh, VIC 3166, Australia*

The Privacy Contact Officer will then investigate and respond to you. All such enquiries or complaints will be taken seriously and handled with impartiality and discretion. If you wish to submit a complaint, please provide Us with all relevant details such as the date and time of the incident or communication, the circumstances surrounding the event and your concerns about what was said or done.

If you have complained about something that is not covered by the relevant applicable privacy laws, We will explain why We are unable to take further action. Please allow a few days for Us to investigate and respond to any privacy complaints.