

PRIVACY POLICY – THE PIGEON PROJECT

IMPORTANT INFORMATION

This Privacy Policy outlines the information collection and handling policies of JCDecaux Australia Pty Limited ACN 078 716 793 in connection with The Pigeon Project. By accessing the Pigeon Project website or using our services, you agree to be bound by the terms of this Privacy Policy.

We understand that privacy is important to you. We comply with the privacy principles set out in this Privacy Policy, and the Australian Privacy Principles ('APPs') contained in the Privacy Act 1988 (the 'Act'), which govern how private sector organisations handle personal information.

UNDERSTANDING THIS PRIVACY POLICY

In this Privacy Policy:

- (a) 'you' and 'your' means you, the participant in the Pigeon Project;
- (b) 'we', 'our' and 'us' means JCDecaux Australia Pty Limited ACN 078 716 793 as Trustee for the JCDecaux Australia Unit Trust ABN 73 619 936 326;
- (c) 'Pigeon Project' or 'Project' means the online insights community project which we conduct, primarily through the 'Pigeon Project' website at www.thepigeonproject.com.au.
- (d) 'Personal Information' has the meaning from time to time in the Privacy Act 1988, but includes information or an opinion about:
 - (i) an individual whose identity is apparent or can be reasonably ascertained from that information (i.e. information that is capable of identifying you); or
 - (ii) an identifiable individual, or an individual that is reasonably identifiable, whether the information is true or not, and whether the information is recorded in a material form or not; and
- (e) 'Sensitive Information' means racial, political, religious, philosophical, criminal, medical or sexual information about an individual.

COLLECTION OF PERSONAL INFORMATION

In order to conduct the Pigeon Project and provide services in connection with it, we need to collect relevant Personal Information. This may include your name, physical address(es), email address, contact phone numbers, age or date of birth, and your elected user name and password.

Generally, all Personal Information is collected directly from you, or with your consent. Our policy is to collect only Personal Information that we need for a particular purpose. The circumstances in which we may collect Personal Information from you include when you:

- (a) register on The Pigeon Project website;
- (b) request to be contacted;
- (c) complete a feedback form;
- (d) provide a response in an online survey;
- (e) participate in a promotional offer or competition; and
- (f) subscribe to a newsletter or a mailing list.

We may collect this information either online or over the telephone. If you choose not to supply us with the Personal Information we request, we may be unable to provide you with services. We may also collect Personal Information from publicly available sources, or where we are legally obliged to do so.

NO COLLECTION OF SENSITIVE INFORMATION

We do not need to collect Sensitive Information about you in order to provide you with services. If we do collect sensitive information, we will only do so with your consent.

COLLECTION OF DEMOGRAPHIC AND OTHER INFORMATION

Sometimes the information we collect may include de-identified demographic information such as age band, gender, location, occupation, employment status, income band, details about your family and household, and your interests and preferences. We may also at times aggregate Personal Information of our participants for reporting and statistical purposes. Finally we will also collect information from you as part of the online surveys which you participate in. Generally the type of information described in this clause ('Non-identifying Information') is not Personal Information as it cannot be used to identify you.

USE OF PERSONAL INFORMATION

Personal Information collected about you is only used:

- (a) to verify your identity;
- (b) to provide you with services you have requested or agreed to as part of the Project, or respond to your queries;
- (c) to contact you and communicate with you in relation to surveys you will be asked to participate in as part of the Project;
- (d); to contact you and communicate with you in relation to competitions you may participate in as part of the Project;
- (e) to notify you about and invite you to events;
- (f) to provide you with information relating to the Project; and
- (g) for our own internal business and research purposes.

USE OF NON-IDENTIFYING INFORMATION

We may pass survey results and other Non-identifying Information on to third parties, including our client advertisers and media agencies. We may also use Non-identifying Information to better inform ourselves of our audience's preferences and requirements, and to enable us to monitor the effectiveness of and constantly improve our services. If we disclose Non-identifying Information to third parties it will not contain any personally identifiable information.

DISCLOSURE OF PERSONAL INFORMATION

We may disclose Personal Information to companies which are part of the JCDecaux group of companies, in which case we will use best endeavours to ensure that those companies adhere to standards and obligations substantially similar to those set out in this Privacy Policy. We will not otherwise disclose Personal Information to third parties without your consent, except:

- (a) to service providers, including IT service providers, who manage or assist us with the operation and management of the Pigeon Project website and its associated data, as well as call centre, help desk and support services providers ('Service Providers');
- (b) to government, law enforcement and regulatory bodies where this is necessary for us to comply with our legal obligations; and
- (c) to parties to whom we may sell all or part of our business, or to whom we propose to sell all or part of our business.

We do not sell, rent or trade personal information to or with third parties.

COOKIES AND WEB LOGS

We may use cookies and web logs on our website to improve its functionality.

Cookies are a small text file that our web sites may place on your computer, and collect information such as your Internet protocol address, your computer's operating system, browser type and traffic patterns. You may adjust your Internet browser to disable cookies, or inform you when one is being used. If you choose to disable cookies, you may be unable to access certain areas of our website. We, or our service providers, may also collect non-identifying web, browser or user information through tools such as Google Analytics.

Sometimes our website contains links to other websites for your convenience and information. When you access a website other than The Pigeon Project website understand that we are not responsible for the privacy practices of that site.

SECURITY

We take reasonable steps to ensure the security of Personal Information held by us from such risks as loss or unauthorised access, destruction, use, modification or disclosure, and that our service providers have appropriate information security safeguards. We only permit personal information to be accessed by authorised personnel.

We collect Personal Information online. You should be aware that the Internet is not a secure environment, that it may be intercepted when out of our possession or control, and that transmission of Personal Information over the Internet is at your own risk.

ACCESS AND CORRECTION

We take reasonable steps to make sure that the personal information we collect, use and disclose is accurate, complete and up-to-date. You may access to the information we hold about you (although there may be some exceptions to this). If you would like to access your Personal Information, please contact our Privacy Officer, Brendan O'Neil (details below), who will explain how we will handle your access request, and whether there will be any associated charge.

We will assume (unless you tell us otherwise) that your request for access relates to our current records about you. These current records include Personal Information about you which is included in our databases, and which may be used by us on a day to day basis. We may, but are not obliged to, archive any out of date Personal Information.

If you believe that Personal Information about you is not accurate, complete or up to date, please provide our Privacy Officer, Brendan O'Neil, with your request for correction (contact details are set out below). We will consider any requests for correction in a timely way.

UNSUBSCRIBE

All electronic communications you receive from us will contain information on how to unsubscribe from communications with us. If however at any time you no longer wish to receive communications from us, please let us know by our Privacy Officer, Brendan O'Neil, whose contact details are set out below.

TRANSFER OF PERSONAL INFORMATION OVERSEAS

Our Service Providers may use servers and data storage facilities which are located outside Australia. Personal Information that we collect may be disclosed, transferred to or stored overseas in connection with the services provided by those Service Providers. The countries to which Personal Information may be transferred include Canada and the UK, as our primary Service Provider has data storage facilities in that country. It is not practicable however to specify all the countries to which Personal Information may be disclosed, and your Personal Information may be transferred to other countries. The Act and corresponding APPs require relevant Australian entities to ensure that, before disclosing Personal Information overseas, reasonable steps are taken to ensure that overseas recipients do not breach the Act or the APPs (APP 8.1). It is not always possible to ensure that overseas recipients will comply. We do not take any responsibility for the actions of overseas third party recipients of Personal Information. By agreeing to this Policy you are agreeing that your Personal Information may be disclosed overseas and that APP 8.1 will not apply to that disclosure.

CONTACTING US

If you have any questions or comments about this Privacy Policy, or if you wish to complain about how we have handled Personal Information about you, please contact our Privacy Officer, Brendan O'Neil:

- (a) by telephone 02 9557 6555; or
- (b) by facsimile 02 9557 6982; or
- (c) by e-mail privacy@jcdecaux.com.au; or
- (d) by letter The Privacy Officer, JCDecaux, Units 2&3, 182-190 Euston Road Alexandria NSW 2015.

We will endeavour to:

- (e) provide an initial response to your query or complaint within 48 hours; and
- (f) resolve your query or complaint within 14 days.

If you are still not satisfied, you can contact the Australian Privacy Commissioner (see <http://www.oaic.gov.au/about/contact.html> or call 1300 363 992).

CHANGES TO THIS PRIVACY POLICY

This privacy policy may change from time to time. This policy was last updated on 26 August 2014.