ARAKELLA PTY LIMITED TRADING AS GROUP NEWSAGENCY SUPPLIES ("GNS")

PRIVACY POLICY ("The Policy")

About this Privacy Policy

This Privacy Policy has been published to provide a clear and concise outline of how and when personal information is collected, disclosed, used, stored and otherwise handled by GNS and or GNS licensed resellers. The Policy relates to your personal information collected through the GNS website "yourlocalnewsagent.com.au" ("**this website**").

GNS is committed to protecting your privacy and the privacy of any personal information provided to us. GNS complies with the *Privacy Act* 1988 (Cth) and the *National Privacy Principles*.

COLLECTION OF PERSONAL INFORMATION

Personal information is information from which an individual's identity may be ascertained. The nature of personal information collected by GNS on this website comprises of the following categories:

- Individual's names and contact details (including address, phone, fax and e-mail);
- Credit card numbers;
- Credit information including (if applicable drivers license details);
- Other necessary information which may be required from time to time in order fulfill the functions of GNS.

GNS only collects personal information for purposes which are directly related to our functions and activities, and only when it is necessary for or directly related to such purposes. The purposes for GNS collecting personal information include:

- Collecting information on behalf of GNS licensed resellers in order to enable the GNS licensed newsagents to provide internet based services to its customers.
- Sorting, categorizing and analyzing the personal information collected for business management purposes.
- GNS licensed newsagents may use the personal information collected on this website for one or more of the following purposes:

    1. processing customers orders or applications;
    2. carrying out credit checking and scoring
    3. providing customers with products and/or services requested;
    4. billing customers or administering accounts;
    5. dealing with requests, enquiries or complaints and other customer care related activities;
    6. carrying out market and product analysis and marketing of products and services generally;
    7. contacting customers about products and services;
    8. registering customer details and allocating or offering rewards, discounts or other benefits;

If for any reason GNS receives personal information that is not 'necessary' for its functions or activities, that information will not be retained.

It is GNS's usual practice to collect personal information either directly from the individual or through the GNS licensed reseller, and not from any other third party.

There may be occasions when GNS or GNS licensed resellers need to source personal information from an external third party. For example, GNS licensed reseller may collect personal information from credit agencies when establishing a credit account.

If we collect other types of personal information from a third party or a publicly available source, we will only do so if the individual has consented to such collection or would reasonably expect us to collect their personal information in this way.

Through the use of a cookie, GNS can record the web pages you visit and the information you require.

A cookie is a small data file that a website may write to your hard drive when you visit them. A cookie file can contain information, such as a user ID, that this website uses to track the pages you have visited. The only personal information a cookie can contain is information you personally supply. A cookie cannot read data off your hard disk or read cookie files created by other websites.

You can set your browser to notify you when you receive a cookie, providing you with the opportunity to either accept or reject it. You can also refuse all cookies by turning them off in your browser.

GNS will destroy personal information when it is no longer required for such functions and activities.

USE AND DISCLOSURE

Personal information provided to GNS will be shared with GNS licensed resellers. GNS will make every effort to ensure that the GNS licensed reseller handle and use the personal information confidentially and in accordance with the National Privacy Principles. GNS will require all GNS licensed resellers to abide by appropriate privacy undertakings.

GNS will use and disclose your personal information for the purpose of which the personal information was initially collected as set out in this privacy policy.

GNS may also use that personal information for a purpose related to the initial purpose of collection, if that other purpose has been advised to you or would be within your reasonable expectations.

GNS will not use or disclose your personal information for any other purposes without first obtaining your express or implied consent. GNS may however be required to disclose your personal information without your consent if the disclosure is:

- required or authorised by law;
- required in order to investigate an unlawful activity;
- required by an enforcement body for investigative activities; or
- necessary to prevent a serious and imminent threat to a person's life, health or safety, or to public health or safety.

From time to time GNS licensed resellers may use your personal information to identify products or services which may be of interest to you and to send you information regarding those products and services.

If you do not wish to receive direct marketing information, please let GNS and the GNS licensed reseller know so that steps may be taken to ensure that you do not receive any direct marketing information in future.

DATA QUALITY

GNS will take all reasonable steps to ensure that the personal information collected, used or disclosed is accurate, complete and up-to-date. In order to keep your personal information up to date we ask that you inform GNS and your GNS licensed reseller of any changes to your personal details.

DATA SECURITY

GNS takes all reasonable steps to protect the personal information it holds from misuse, loss and unauthorised access, modification and disclosure.

GNS will destroy personal information - or make it impossible to identify the person it relates to - if it is no longer needed for any of the purposes for which it was collected.

OPENNESS

If requested by an individual, GNS will take reasonable steps to let the individual know more detail about the sort of personal information it holds, the purpose for which the information is held and how the information is collected, used, stored and disclosed.

CHANGES TO THIS POLICY

GNS may change this Policy from time to time for any reason and will update the policy accordingly.

ACCESS AND CORRECTION

As a general rule, GNS will, upon request, give an individual access to any personal information held about them.

However, GNS doesn't have to give access in some circumstances, for example if:

- it would be unlawful to provide the information;
- it would pose a serious and imminent threat to the life or health of any individual;
- it would have an unreasonable impact upon the privacy of other individuals; or
- the request is frivolous or vexatious.

If providing access would reveal evaluative information about a commercially sensitive decision-making process (for example a credit scoring process used by a credit provider), then GNS may give an explanation rather than direct access to the information.

GNS may charge a reasonable fee for providing access to personal information, but no charges will apply to lodging a request for access.

GNS will take reasonable steps to correct any personal information if it can be established that it is not accurate, up to date or complete. If GNS doesn't agree that there's a problem with the information GNS will, if requested, include a statement with the information about an individual's allegations.

Where access is denied, or there is a refusal to correct personal information, GNS will advise accordingly.

The procedure for gaining access is as follows:

1. All requests for access to your personal information must be made in writing and addressed to the GNS State Manager in each Capital City.
2. You must provide as much detail as possible regarding the provision of your personal information.
3. GNS will acknowledge your request within 14 days, and access will usually be granted within 14 days, or if it is more complicated, 30 days. GNS will inform you if this timeframe is not achievable.
4. You will be asked to verify your identity.
5. A fee may apply to such access in the event that a request for access is onerous or time consuming. Such a fee will cover staff costs involved in locating and collating information, and reproduction costs.

6. Depending on the circumstances, you may be forwarded the information by mail or email, or you may be required to personally inspect your records at a nominated location.
7. You will be given the opportunity to correct any personal information which is no longer accurate.

COMPLAINTS

If you believe that your privacy has been infringed you are entitled to complain. All complaints should initially be in writing and directed to the GNS State Manager in each Capital City. GNS will respond to your complaint as soon as possible, within 14 working days, to let you know who is responsible for managing your query. GNS will try to resolve the complaint within 30 working days. If this is not possible GNS will contact you to provide an estimate of how long it will take to handle the complaint.

If you believe GNS has not adequately dealt with your complaint, you may complain to the Privacy Commissioner whose contact details are as follows:

Officer of the Federal Privacy Commissioner
133 Castlereagh Street
Sydney NSW 2000
02 9284 9800
www.privacy.gov.au

Date this Policy was last updated:
5th May 2009