



PRIVACY POLICY

This Privacy Policy has been adopted by BCC Collective Pty Ltd (ACN 689 633 485) ("BCC", "we" "our" or "us") and applies to BCC's handling of personal information.

By:

1. visiting the BCC website accessible via domain <https://www.bcccollective.com.au> ("the Website");
2. engaging BCC to provide you with professional content creation, social media management, digital advertising, influencer marketing, talent management, event planning or advisory services; or
3. engaging any talent / influencers under BCC's management to provide you or any third party with services;
4. otherwise providing us with your personal information for any purpose and by any means;

you agree to us dealing with your personal information in accordance with this Privacy Policy, as may be varied from time to time, and you hereby acknowledge and consent to us collecting, using, storing, and disclosing your personal information as set out herein.

1. Collection of Personal Information

The types of personal information that we collect from you will depend on the nature of your dealings with us. We only collect the personal information that we reasonably need to carry out one or more of our functions or activities.

As part of our usual business activities, we commonly collect personal information from:

1. talent / influencers;
2. talent managers; and
3. brands / advertisers; and
4. influencer marketing agencies and other related agencies.

We may collect personal information:

1. directly from you when you provide us with your personal information:
 - a. through the Website forms;
 - b. by email;
 - c. in social media direct messages;
 - d. in meetings with us;
 - e. by any other way in which you provide it to us;
2. automatically via cookies, analytics and tracking tools used on our Website; and
3. from third parties, such as talent managers, when we engage talent / influencers for campaigns via their talent manger.

Save as otherwise set out in this Privacy Policy, we will only collect personal information about you directly from you unless it is unreasonable or impracticable to do so.

We do not knowingly collect the personal information of any children.

We may collect personal information from individuals located outside of Australia if we are working with talent / influencers, talent managers, brands / advertisers or influencer marketing agencies based in foreign markets outside of Australia.



If you provide us with any information relating to a third party, you warrant to us that you have the right to authorise us to collect and process that information in accordance with this Privacy Policy.

The following table sets out the personal information we may collect from you when you deal with us in certain ways and why we need to collect it:

Common circumstances when we might collect personal information from you	What we might collect and why we need to collect it / how we may use it	To whom we may disclose it
Personal information of talent / influencers will be collected from the talent / influencer directly when BCC agrees to provide talent management services to that talent / influencer. When BCC is acting for brands who wish to engage the talent / influencer for their campaigns, talent / influencer information may be collected directly from the talent / influencer or from their talent manager if they are represented.	The personal information we will commonly collect includes: 1. the talent's / influencer's name, address, email and phone number - to identify the talent / influencer, to be able to contact the talent / influencer and for invoicing and payment purposes; 2. the talent's / influencer's ABN, tax file number, superannuation fund details and bank account details - for invoicing purposes and to enable the talent / influencer to be paid; 3. the talent's / influencer's social media handles – for talent / influencer identification and for contracting and contract management and review purposes; 4. the talent's / influencer's signature - for contracting purposes; 5. the talent's / influencer's date of birth - to send birthday cards and gifts at the appropriate time; 6. the talent's / influencer's social media insights - for campaign consideration and measurement purposes.	If BCC is providing talent management services for the talent / influencer, BCC may: 1. share any of this information (to the extent reasonably necessary) with brands or their agencies who wish to engage the talent for a campaign; and 2. publish the talent's / influencer's name, social media handles, location and image on the Website, noting that we act as the talent's / influencer's talent manager. If BCC is acting for brands who wish to engage the talent / influencer for their campaigns, BCC may share this information with the brands who wish to engage the talent / influencer for their campaigns.
Personal information of talent managers at third party agencies will be collected when BCC is acting for brands who wish to engage the talent / influencer under	The personal information we will commonly collect includes: 1. the talent manager's name, address, email and phone number - to identify the talent manager, to be able to contact	BCC may share this information with brands who wish to engage talent / influencers under the management of the agent for contracting, invoicing and payment purposes.



their management for campaigns.	the talent manager and for contracting purposes; 2. the talent manager's ABN (if a sole trader), social media handles and signature - for contracting purposes; and 3. the talent manager's bank account details (if they are a sole trader) - for the purpose of payment of invoices.	
Personal information of our clients will be collected if they wish for us to provide them with any of our services.	The personal information we will commonly collect includes: 1. the client's or client contact's name, address, email, phone number and ABN - for identification purposes, for contracting purposes and for invoicing purposes; 2. the client's or client contact's date of birth - to be able to send gifts to the client at the appropriate time; 3. the client's social media handle - for the purpose of providing the client with our services; and 4. the client's bank account details - for the purpose of providing our services and for invoicing and payment purposes.	BCC may share our client's name, address, email, phone number, ABN and social media handles with talent or talent managers for the purposes of arranging campaigns or providing our services. BCC may also share this information with third party vendors or suppliers (such as photographers or videographers or the providers of venues for events).
Personal information of third-party contractors / vendors (e.g. photographers or videographers)	The personal information we will commonly collect includes: 1. the third-party's name, address, email and ABN - to identify the third party, to send any products or required elements, and for briefing, contracting, invoicing and payment purposes; 2. the third-party's date of birth – to send a gift at the appropriate time.	BCC may share this information with any brands / advertisers to whom we are providing our services when collecting and storing this information.
Personal information of our employees will be collected for the purposes of engaging	The personal information we will commonly collect includes: 1. the employee's name, email address, residential address	BCC may share our employee's name, usual location and qualifications on the Website to advertise the



them for employment and for paying them.	and phone number - for the purpose of identifying them, entering into an employment agreement with them, managing their employment at BCC and paying them; 2. the employee's qualifications and prior experience - for the purpose of understanding their ability to provide services and to advertise to BCC clients; 3. their date of birth, tax file number, superannuation fund details and bank account details - for the purpose of paying them.	services BCC can provide and the team who will provide them.
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When you access or use the Website, we may also collect technical data, such as your IP address, device identifiers and location data and any other online identifiers that could be used to identify you. We use this information for internal purposes such as auditing, data analysis, and research to improve the Website and our service offerings. We may also use this information to protect our interests or enforce our commercial terms.

We will not directly collect or store any credit card details or bank account details you may provide to us **[(save for in the case of our employees)]**. Any credit card details or bank account details you input into the Website are provided directly to, and processed by, our third-party payment processor, Stripe. You should refer to their Privacy Policy to understand how they will handle your personal information when you provide it to them.

All of BCC's invoicing is processed through Xero, and you consent to us inputting your name, address and contact details into the Xero platform for the purpose of invoicing. You should refer to Xero's Privacy Policy to understand how they will handle your personal information when it is provided to them.

2. Collection of Sensitive Information

We collect the following sensitive information for the following reasons:

Sensitive information we collect	Why it is necessary to collect it	To whom we may share the information
We may collect ethnic origin of talent / influencers.	To determine the talent's / influencer's suitability for certain skin treatments / products based on their Fitzpatrick Skin Type.	If we are providing advisory services to a skincare brand, we may disclose this information to that brand if they are considering engaging the talent / influencer to provide influencer marketing services or similar services involving the trial of products for the brand. We may collect this information from the talent / influencer directly or from their talent manager in cases where the talent manager is clearly authorised to provide that



		information on the talent's / influencer's behalf. If we are performing talent management services for the talent, we may disclose this information to any brand or their agency (only to the extent such information is relevant to their performance of the services) if they are considering engaging the talent / influencer for an influencer marketing campaign. We will collect this information directly from the talent under our management.
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We may also share sensitive information with our insurers or legal advisers to the extent reasonably necessary to maintain or claim on our policies of insurance or to seek legal advice or to protect or enforce our rights.

By providing us with any sensitive information, you consent to us collecting and storing that sensitive information in accordance with this Privacy Policy. You may withdraw that consent at any time, whereafter we will erase any sensitive information we hold, unless it is required to be retained under any policy of insurance, under any law, to protect our rights, or for any other lawful purpose.

3. Use of Personal Information

The particular purpose for which we collect personal information will either be explained when we collect that information, is set out in this Privacy Policy or will be obvious from the context in which it is collected.

In addition to the ways in which we use your personal information in certain circumstances as set out above, we may also use any of the personal information (save for sensitive information) we collect from you in any of the following ways:

- A. to send important notices, such as changes to our terms and conditions and policies;
- B. to help us deliver and improve the Website and for loss prevention and anti-fraud purposes;
- C. to enforce any of our agreements or to otherwise protect our rights;
- D. for internal purposes such as auditing, data analysis, and research to improve the Website and our user communications;
- E. to enable third party service providers engaged by us to perform tasks like technical, logistic or other business tasks on our behalf; and
- F. for account and network security purposes.

We will only use your personal information for the particular purpose we collected it as set out herein, for any purpose for which you have consented, or for other purposes that are directly related to that purpose. If we want to use personal information for any other purpose, we will first obtain your consent.

4. Disclosure of Personal Information

In addition to the disclosure rights set out above, we may use disclose your personal information (only to the extent reasonably necessary):

1. to third parties if required by law, if necessary to report a data breach, or as otherwise permitted under the Privacy Act or other local laws. We may also disclose your personal



information as is reasonably necessary to enforce any of our agreements or to protect our rights or property; and

2. to our related entities, officers, employees and contractors and external service providers who help us operate or protect our business and to maintain the Website, for example, IT consultants, developers, website hosts, professional analytics tool providers, insurance advisors, independent contractors, lawyers, accountants and other professional advisors. When we engage external service providers, we require those contractors to comply with contractual privacy obligations that reflect our own privacy obligations where possible.

We may also exchange your personal information (to the extent reasonably necessary) with third parties for the purpose of fraud protection.

In the event of a re-organisation, merger or sale, we may transfer any and all personal information we collect to the relevant third party on a confidential basis for them to use in the same way that we use that information.

We do not rent or sell personal information to third parties in our usual course of business.

5. Storage and security of Personal Information and overseas disclosure

Personal information provided to us is stored in Google Workspace password protected documents. We take reasonable steps to protect personal information, including having two-factor-authorisation security on our Google Workspace password protected documents

Our payment processor, Stripe, is dual-headquartered in San Francisco, California, United States, and Dublin, Ireland and our invoicing system Xero is headquartered in New Zealand.

By providing us with your personal information:

- A. you understand and acknowledge that we utilise the third-party providers for the purposes set out herein, that they are located outside of Australia, and you consent to that disclosure;
- B. you consent to your personal information being collected, used, disclosed and stored as set out in each of our third-party providers' Privacy Policies, and agree to abide by their relevant terms of use; and
- C. that by consenting to that disclosure, Australian Privacy Principle 8.1 contained in Schedule 1 of the Privacy Act will not apply.

We may also disclose personal information to third parties (such as brands or their agencies or talent / influencers or their talent management) located outside of Australia to the extent reasonably necessary to fulfil our service obligations to our clients or talent / influencers under our management.

6. Access, correction and retention of Personal Information

You have the right to seek access to the records of personal information that we hold about you. You also have the right to ask us to correct your personal information where it is not otherwise correctly recorded.

If you wish to access any personal information that we hold about you, please set out your request in writing, and send it to us using the contact details set out at the end of this Privacy Policy.

Unless we are otherwise required by law, or a court / tribunal order to retain the information, we will take reasonable steps to destroy the personal information that we hold about you, or to ensure that the information is de-identified, when we no longer need to retain the information for any purpose for which the information may be used or disclosed by us as set out herein.

7. Management of privacy online



In general, you can browse parts of the Website without telling us who you are or revealing personal information about yourself. If you wish to engage us to provide you with any services, or to engage any talent / influencer that we manage, we will need to collect some personal information from you, depending on the nature of your request. If you do not provide us with that personal information, we will be unable to assist you with your request.

At the time of collection of your personal information, we will seek your permission for your personal information to be stored in accordance with this Privacy Policy.

The Website may from time to time contain links to third-party websites. Information collected by third parties when you access their websites via those links, which may include personal information, is governed by their privacy practices and not by ours. You should review those policies prior to providing any personal information via those third-party websites.

We may from time to time decide to use cookies on the Website to measure your use of the Website, and to improve the Website functionality. Whilst most internet browsers are set to accept cookies, you can set your internet browser to reject cookies, or to notify you when they are being used. If you reject cookies, you may limit the functionality of the Website when you access it.

No data transmission over the internet can be guaranteed as completely secure. We are not responsible for any unauthorised use of personal information by third parties which is outside of our reasonable control.

8. Networks and technologies

We use cookies and tracking tools on the Website to ensure the Website functions as intended, to enhance visitor experience and to provide us with analytics about the use of our Website.

Social media platform pixels may be installed on the Website from time to time and capture your use of the Website for ad retargeting purposes.

By using the Website, you consent to us using networks and technologies as set out herein.

9. Complaints

If you have any questions about this Privacy Policy, or if you wish to make a complaint about how we have handled the personal information we hold about you, please send us an email to **info@bcccollective.com.au** setting out the details of your question or complaint.

Any complaint will be investigated, and the outcome of that investigation communicated to you within 30 days. If you are not satisfied with the outcome or the handling of the complaint by us, you can contact the Office of the Australian Information Commissioner by calling 1300 363 992 or by sending an email to enquiries@oaic.gov.au.

10. Review of Policy

We periodically review this Privacy Policy and reserve the right, at our absolute discretion, to modify or remove portions of this Privacy Policy at any time by publishing revised versions on the Website.