

# Personal Data Policy

## **We Respect Your Privacy**

At Full Fun\* the security of personal information that we collect is of utmost importance to us.

You can find information about how we handle and manage your personal information in this Privacy Policy. Our aim is to provide this information to you in an open and transparent manner, so that you can make informed decisions about your dealings with us. This Privacy Policy also provides information about how you can seek access to and correction of the personal information that we hold about you. We may update or revise this Privacy Policy from time to time.

## **What kinds of personal information does Full Fun collect and hold?**

The kinds of personal information that we collect will vary depending upon our interaction with you but may include:

- your name, address and other contact details (like your telephone number);
- your email address;
- your date of birth;
- your gender;
- transaction details relating to any purchase(s) that you have made with us or that have been made on your behalf;
- credit card details, if you make a purchase with us or choose to have these stored in your online My Full Fun account to make the checkout process faster;
- your My Full Fun username;
- any preferences that you select; and
- any other personal information which may be required in order to facilitate your dealings with us.

## **How does Full Fun collect personal information?**

Generally, we collect personal information when you:

- make a purchase through our network which includes our website, mobile site, call centre, group bookings department.
- register as a My Full Fun member via our website, and mobile site.
- participate in a Full Fun survey, competition, promotion or other marketing campaign;
- indicate that you wish to receive news, offers or other marketing material from Full Fun;

- sign up to a waitlist or an event
- make an inquiry or a complaint;
- have other dealings with us, for example, via social media or in person, over the phone or when you write to us.

In certain circumstances, we may also collect personal information about you in the course of combining and analysing different data sets which, in and of themselves, may not contain personal information.

**Sometimes we collect personal information about you from other sources, for example:**

- people making a purchase on your behalf;
- our business clients such as venues, promoters and sponsor; or
- third party suppliers and contractors who assist us to operate our business, such as:
  - information technology suppliers
  - marketing and digital services suppliers
  - research and development organisations
  - data partners
  - analytics consultants; and
  - publicly available sources of information

Also, from time to time Full Fun collects personal information about individuals who are not customers. This is usually where we collect the name and business contact details of a person who is the contact in a government agency or company with whom we deal. Full Fun's policy is to only use personal information collected from non-customers for the main business purpose for which it was collected.

**How does Full Fun hold personal information?**

Full Fun may hold your personal information in electronic or hard copy format or a combination of both. This personal information may be combined or linked with other information held about, or which we attribute to, you, including:

- information (personal or otherwise) that we collect from our website and mobile site (as described below in relation to "Cookies, Tracking and Advertising") or from third parties; and
- personal information we receive from our group companies and client businesses, who, in common with us, have a relationship with you and where we understand that you have consented to such group companies and client businesses sharing your personal information with us.

We have taken a number of physical, electronic and procedural steps to protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure.

Full Fun protects the personal information it collects in a secure database stored by our third party data storage provider. It is in proprietary data format, which can only be read using proprietary tools.

Data collected online is stored in a Microsoft SQL database; a protected, secure data centre that is unreachable by the internet. Full Fun encrypts data sent from your computer to our systems during internet transactions. Full Fun also employs firewalls, intrusion detection systems and virus scanning tools to protect against unauthorised persons and viruses from entering our systems.

Full Fun employees are required, as a condition of their employment, to treat personal information held by Full Fun as confidential, and to maintain the confidentiality of that personal information. They are also required sign in and use a password when accessing Full Fun systems and to undertake training about how to manage personal information.

### **What are the purposes for which Full Fun may collect, hold, use and disclose personal information?**

Generally, Full Fun only uses personal information for the primary purpose for which we have collected it, or for another closely related secondary purpose. Our potential uses of personal information which Full Fun collects (and for which you consent to us using your personal information for) may include:

- to process and fulfil your orders for tickets (or other items) from us;
- to contact you if there is an event cancellation or change in event details, or for the replacement of lost tickets;
- to get a better understanding of you, your needs, your behaviours and how you interact with us in order to identify ways in which we can provide you with a better service, or enhance your experience of our website and mobile site or other services;
- managing your dealings with us as a My Full Fun member;
- so that we can promote our products and services to you and the products and services of third parties that we deal with;
- to allow our related companies to promote their products and services to you and those of their partners;
- so that venue operators and promoters of events for which you purchase tickets sponsors, sporting clubs, authorised ticket onsellors and resellers can use it for operational purposes;
- detecting and preventing fraud and unauthorised ticket onselling;

- for business research and development of new products and services, including for My Full Fun members and our business clients;
- to facilitate the competitions, special offers and promotions that we or our partners run;
- displaying content and advertising (including in relation to tickets and events) that is customised to your interests, preferences and experiences, including through online targeted marketing, data and audience matching and market segmentation activities;
- verifying your identity;
- so that we can respond to inquiries and complaint handling; and
- for the conduct of data analytics and predicting trends;
- marketing services in connection with the products and services we provide; and
- to comply with our legal and regulatory obligations and enforce our legal rights.

Sometimes Full Fun will produce aggregated data. Full Fun may also receive aggregated data from its third party suppliers and contractors or business customers. This aggregated data does not identify individuals. Full Fun uses, and may combine, the aggregated data it produces and receives for research purposes and in connection with products and services we provide to our business clients.

From time to time, there may be other purposes for which we collect, hold, use and disclose your personal information. We will tell you about these at the point of collection.

### **Direct Marketing and Research**

As set out above, Full Fun may use personal information about you for marketing and research purposes. However, you can manage your Full Fun communication preferences in a number of ways, eg within your My Full Fun account if you are an online customer. In addition, the marketing communications that we send to you may also contain information on how to unsubscribe from those communications.

You can also tell us at any time if you do not want us to disclose your details to other organisations such as our related companies or third parties for marketing purposes. To do this, you just need to contact [contact@hellokittyadventure.com](mailto:contact@hellokittyadventure.com).

### **Who might Full Fun disclose my personal information to?**

Full Fun may disclose your personal information:

- to venue operators and to promoters of events for which you purchase tickets. Full Fun discloses your personal information to such organisations for operational purposes and because from time to time they may choose to provide you with information about their events by ordinary post. If you consent, these organisations may use this information to provide you with promotional and marketing material about their events via email. You may change your preference to receive email marketing at any time directly with the organisations which have obtained your information;
- to sponsors, authorised ticket on-sellers and re-sellers who (unless they obtain a separate consent from you) use it for operational purposes only, for example, to provide you with additional information about the event or venue that you are attending; and
- to third party contractors and service providers who help us operate our business or provide a service to you. Full Fun may disclose your personal information to third party contractors and service providers who, for example, help us operate our computer systems, provide us with fraud prevention services, operate certain features accessible from our website, send out our mail/email and clean collected data and who perform data analysis to group demographic attributes of individuals.
- to Government bodies/instrumentalities or the Seller, in response to, or in anticipation of, a request for your personal information for the purposes of COVID-19 contact tracing or responding to COVID-19 related public health orders or directions. The contact tracing information which may be disclosed includes your full name, contact email and/or contact phone number and by purchasing your ticket, you are providing Full Fun with your permission to disclose such information for this purpose.

Otherwise, Full Fun will only disclose your personal information:

- where we are required to do so by law;
- if the disclosure is permitted under the Privacy Act 1988 (Cth); or
- if you have consented to the disclosure.

### **What happens if Full Fun does not collect my personal information?**

Where it is lawful and practicable to do so, we will give you the option of not providing personal information, or of using a pseudonym, when you deal with Full Fun. For most events, you may be able to make a cash transaction at a Full Fun retail agency without providing personal information.

However, if we do not collect personal information about you at the point of sale or when you interact with us, this could impact the level of service we can provide to you, for example, we will not be able to contact you in the case of an

event cancellation or venue change or we may not be able to properly respond to your inquiry or investigate your complaint or fully process your transaction.

### **Cookies, Tracking and Advertising**

For each visitor to our website and mobile site, our server automatically recognises and stores the visitor's IP address. In addition, our website and mobile site use cookies. To enhance your experience when using our website or mobile site, these store information you have provided to us (such as your postcode, preferences, region and sign in username) to enable us to provide a more personalised service to you. If you use the 'Keep me signed in' feature during the My Full Fun 'sign in' process, the cookies will also store your sign in username. Our website and mobile site may also carry third party cookies, which automatically collect anonymous information from you, such as your demographics and interests. This information may be disclosed to third parties for the purpose of providing you, and others, with a more targeted ticket and event information and/or an enhanced advertising experience both on and off the Full Fun website or mobile site. Most web browsers are set by default to accept cookies. However, if you do not wish to receive any cookies you may either set your browser to prompt or refuse cookies. Note that rejecting cookies will disable your browser from purchasing tickets from our website or mobile site. We also use cookies for measuring, collecting, analysing and reporting data from our website and in connection with general marketing and research services. This allows us to better understand our users and improve the layout and functionality of our website. This tracking is conducted in such a way to ensure the anonymity of visitors.

Sometimes our website or mobile site contains links to third party websites, for your convenience and information. When you access a non-Full Fun website, please understand that Full Fun is not responsible for the privacy practices of that site. We suggest that you review the privacy policies of each site you visit.

### **Access and Correction**

Under the Australian Privacy Principles, you have a right to request access to the personal information that Full Fun holds about you and seek its correction. If you are a My Full Fun member, you are able to access or correct some of your personal information by logging onto our website ([www.FullFun.com.au](http://www.FullFun.com.au)) or mobile site ([m.FullFun.com.au](http://m.FullFun.com.au)). If you are not a My Full Fun member, so that your request reaches the right person, please send it to [contact@hellokittyadventure.com](mailto:contact@hellokittyadventure.com). Please include your contact details such as email address and telephone number and enclose a copy of a form of identification such as a current driver's licence or passport. We will not charge you for making such a request but will let you know if there is a cost for supplying you with access to or correcting the personal information. We aim to respond to requests

for access or correction within 30 days. There are certain situations under the Australian Privacy Principles where we may refuse to provide you with access to or correct your personal information but we will always let you know in writing if this is the case.

If you feel that Full Fun is not complying with this Privacy Policy or the Australian Privacy Principles contained in the Privacy Act 1988 (Cth), please put your concerns in writing and send to our contact email [contact@hellokittyadventure.com](mailto:contact@hellokittyadventure.com) by one of the methods set out above.

We will always endeavour to investigate your complaint and respond to you as soon as practicable after receipt, generally within 30 days. If you are not satisfied with our response, you may refer the matter to the Office of the Australian Information Commissioner.

Last updated 05 July 2024

\*Full Fun means Winning Investment Group Pty Ltd, ABN 69 608 516 258