

## BOOM GROUP

### Privacy Policy

Last updated: 1 August 2015

Boom Corporation Pty Ltd ABN 43 140 810 779 and its related companies and businesses including Boom Network Pty Ltd ABN 75 600 853 610 and Boom Collective Pty Ltd ABN 33 600 853 610 (together and separately **Boom Group**) recognises that the persons to whom Boom Group provides services and persons who visit Boom Group's websites located at [www.boomvideo.com.au](http://www.boomvideo.com.au), [www.boomcollective.net](http://www.boomcollective.net) and boomvideo.tv (together and separately **website**) are concerned about the security of their personal information.

This privacy policy describes the way in which Boom Group collects, uses, discloses and protects personal information.

Boom Group reserves the right to change this privacy policy. Therefore, it is important that you review the privacy policy regularly. This privacy policy is current as at the date specified above. By continuing to engage in commercial transactions with Boom Group or use this website you accept the Privacy Policy as it applies from time to time.

Our supply of services to you as an Advertiser, Publisher or Content Creator are subject to the [Services Agreement](#).

Your use of the website is also subject to the [Website Terms and Conditions](#).

#### 1. Persons to whom Boom Group provides services

##### (a) Information collected

Boom Group provides services to persons who register to submit advertisements for placement (**Advertisers**) and persons on whose website or applications (**properties**) Boom Group places advertisements (**Publishers**). During the online registration process, Boom Group collects the following information:

(a) **Advertisers** – Your name, your email address, the company for which you work, your address, a password and your bank account and other information necessary to issue invoices.

(b) **Publishers** – Your name, your email address, the company for which you work, your address, your bank account details and information necessary to issue invoices. Boom Group also collects information about the properties on which advertisements will be placed but this information does not require information about any individual user.

(c) **Content Creators** – Your name, your email address, the company for which you work (if applicable), your address, your bank account details and information necessary to issue invoices. Boom Group also collects information about the properties on which content will be placed but this information does not require information about any individual user.

##### (b) Information collected via embedded technologies

To provide services to you, to determine which advertisements should be included in particular properties and for the analysis, modification and development of services (including billing and revenue distribution), Boom Group embeds cookies and/or other codes and technologies in the advertisements which it places on behalf of Advertisers on Publishers' properties.

In addition, this technology allows Boom Group to collect information about persons who access the advertisements and properties (**end users**) from the end users' devices. The information collected from end users includes: bundle ID, language ID, operating system version, device model, software developer kit (SDK) version, unique device identifier, IP address, and Media Access Control address, statistics about videos and video playback such as start/boot-up information, amount played/session length information, memory on device used for our video cache, videos cached on a device and complete view event. Boom Group shares device identifiers and a hash of the Media Access Control address with Advertisers so that they can track average revenue per user and life time value for the end users they acquire through the advertisements. All of

the information we collect about an Advertiser's end users is presented to you through a dashboard (accessible through your account) including information analysed by our analytics service (which may be provided by Boom Group or by a third party). You cannot access data about the end users of another Advertiser through the services.

Boom Group may share aggregated or anonymous information about you or your end users with other Advertisers and with publishers, business partners, sponsors, and other third parties.

Under the [Services Agreement](#), you may also be required to provide to us information of the type specified above which you collect directly from end users or their devices. As provided in the [Services Agreement](#), you must ensure that you have obtained all necessary consents to your disclosure to us of information of the type specified above and for our use of that information as specified in the following section.

#### **(c) Use and disclosure of information collected**

Boom Group uses the information collected during the registration process to provide services you as an Advertiser or Publisher (as applicable) and to communicate with you in relation to other services offered by Boom Group from time to time. If Boom Group engages third parties to provide some or all of the services on its behalf or to assist Boom Group in the analysis, modification or development of its services, Boom Group will disclose your personal information to these third parties to the extent necessary to provide the services to you.

Boom Group may share your information and end user information with third parties with whom Boom Group has a strategic relationship, such as other Advertisers or Publishers. The information shared with these third parties may be used for industry analysis, tracking ad conversions or demographic profiling.

Boom Group may also provide your information and end user information to our business partners or other entities for the purpose of providing you with information on goods and services we believe will be of interest to you.

#### **(d) Destruction of personal information**

Boom Group will delete all your personal information of Advertisers and Publishers on conclusion of the provision of services to you (except that we will retain any information which we are required to retain under applicable laws).

### **2. Visitors to the website and other persons who contact Boom Group**

#### **(a) Information collected**

Boom Group does not collect any information about visitors to the website who are not either Advertisers or Publishers. However, if you contact Boom Group in person or by mail, telephone, fax or email, Boom Group will collect any information that is required to respond to your contact. This will include your name, address, telephone number and email address.

#### **(b) Cookies and other codes**

The website does not currently install any cookies or any other codes in a user's web browser which collect information from devices used by persons to visit the website.

#### **(c) Use and disclosure of information collected**

Boom Group will only use the information as required to address the issue arising from the communication which you instigated. Where your communication relates to the possible supply of goods or services, Boom Group may contact you on a periodic basis to discuss your requirements for goods or services.

Boom Group will not disclose any information you provide to any third party.

#### **(d) Destruction of personal information**

Boom Group will delete all your personal information on completion of our dealings arising from the communication you instigated (except that we will retain any information which we are required to retain under applicable laws).

### **3. Additional circumstances in which Boom Group may disclose your personal information**

In addition to the disclosure of personal information as described above, Boom Group:

\* will disclose any information about you or your end users as required under applicable laws or for the purposes of court proceedings; and

\* to third parties in connection with the sale of all or substantially all of the business or assets or Boom Group or as part of the sale of shares in Boom Group or a corporate re-organisation.

#### **4. Storage and security of your personal information**

Boom Group will take reasonable steps to keep any personal information Boom Group holds about you secure. However, except to the extent liability cannot be excluded due to the operation of applicable laws, Boom Group excludes all liability (including in negligence) for the consequences of any unauthorised access to your personal information. Please notify Boom Group immediately if you become aware of any breach of security.

Boom Group may store your files in hard copy or electronically in our ordinary IT systems. These may include Australian-based cloud servers or the servers of third parties within Australia.

Boom Group implements a range of physical and electronic security measures to protect the personal information that we hold, including:

- mandatory password protection on all computers (users are required to change their passwords at regular intervals);
- hardware encryption on desktops, laptops and portable storage devices;
- secure hard copy document, electronic storage media and hardware disposal procedures;
- firewall and antivirus/malware software; and
- systems and application access controls implemented to restrict access to information (on a need to know basis).

Boom Group also has a regular review program to test the security measures in place.

#### **5. Overseas disclosure**

As noted above, Boom Group may share certain information with Advertisers, Publishers and other third parties. These persons are located both within Australia and outside Australia including the USA, Canada, Europe and Asia.

#### **6. Review of information we maintain about you**

You have a right to request access to or correction of your personal information held by Boom Group. If you wish to access, correct or update any personal information Boom Group may hold about you, please contact us as set out below. However, Boom Group may charge for providing access to this information and Boom Group may refuse access where the Privacy Act allows us to do so.

#### **7. Complaints process**

If you have any questions or concerns about Boom Group's collection, use or disclosure of personal information, or if you believe that we have not complied with this Privacy Policy or the Privacy Act, please contact us as set out below. The Privacy Officer will investigate the complaint and determine whether a breach has occurred and what action, if any, to take. When contacting Boom Group, please provide as much detail as possible in relation to the query, issue or complaint.

Boom Group will aim to resolve any such complaint in a timely and efficient manner within 30 days. Boom Group requests that you cooperate with us during this process and provide Boom Group with relevant information Boom Group may require.

Boom Group expects its procedures will deal fairly and promptly with your complaint. However, if you remain dissatisfied, you can also make a formal complaint with the Office of the Australian Information Commissioner (which is the regulator responsible for privacy in Australia).

Complaints to the Office of the Australian Information Commissioner must be made in writing as follows:

**Mail** Director of Compliance  
Office of the Australian Information Commissioner  
GPO Box 5218

Sydney NSW 2001

**Website** [www.oaic.gov.au](http://www.oaic.gov.au)

Please direct any privacy issues or queries to Boom Group's Privacy Officer at [support@boomcollective.net](mailto:support@boomcollective.net).