

# Hubbl PRIVACY POLICY

## FOXTEL AND YOUR PERSONAL INFORMATION

**Effective: 14 February 2024**

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### **1. Our Privacy Commitment**

The Foxtel Group (“we,” “us”, “our”) (see section 14), including our affiliates, understand that you care about your personal information and how it is used. We value your trust in sharing your personal information with us and are committed to protecting your privacy, as further described in this Privacy Policy.

We are committed to handling your personal information in accordance with the Privacy Act 1988 (Cth) (the “Privacy Act”) and the Australian Privacy Principles (the “APPs”).

### **2. Our Privacy Policy**

This Privacy Policy sets out what personal information (as defined in the Privacy Act) we collect about you and how we use and disclose your personal information. It also incorporates our Credit Reporting Policy which sets out how we collect, use and share credit related information about you.

The types of information we collect, how we collect it, how we use the information, and who we disclose it to, will depend on the Services you apply for or use, and the relationship we have with you.

### **3. What information do we collect and how?**

This Privacy Policy applies to information we collect directly from you or automatically via your behaviour/interaction with us, when you apply for or use our Services or interact with us offline or online (including through social media), as well as information we collect from other sources.

If you choose not to provide the information we request from you, we may not be able to provide you with the Services.

3.1. Information we collect directly from you. We may collect information directly from you when you:

1. register for or use our Services (e.g. your name, contact information, date of birth, gender, preferences, payment information, identification information where required, information relating to your credit worthiness, and the username and password for your account);
2. make an enquiry or complaint or otherwise interact with our customer support representatives by email, phone, webchat or social media;
3. subscribe to a newsletter or participate in our competitions, rewards programs, promotions, surveys, research or marketing campaigns;
4. participate in online forums, blogs or discussions on our websites, social media sites or apps;
5. apply for a job or contract with us (e.g. your contact information, education, work history or other information included in your CV or collected by us as part of your application process); and
6. acquire a third party product or service and we collect payment from you on behalf of the third party.

We may also need you to provide information about someone else, for example, where you nominate an authorised representative on your account for a Service. If so, you must have their consent to provide their information to us and notify them of this Privacy Policy.

3.2. Information we collect automatically. When you access, use or interact with us and/or our Services, we (or our service providers) may collect the following information automatically:

1. information about your interactions with our Services, such as viewing and browsing habits, the frequency of viewed shows/channels/websites, the content you record, search queries and activities, advertisements you have been shown, and how you access or view content, including when you use our applications;
2. information about your interactions with third party applications made available via our Services, such as when and how you launch the application, and the content you view and for how long;
3. information about the device used to access our Services and your use of the device such as search queries, application launches, performance and diagnostic data, browser type, operating system, software or hardware information, IP address (which may indicate your general location), network connection type (e.g. Wi-Fi) and provider, unique device identifiers (including resettable device IDs also known as advertising identifiers) and the geolocation and other transactional data from your device (which may include precise location data);
4. a voice command (e.g. search requests or instructions) via a remote for one of our Services. Voice commands are stored anonymously to action the command and for troubleshooting; they are not linked to personal information we hold about you;
5. details of your interactions with our marketing, advertising and service messages (e.g. whether you have opened an email from us) and your interactions with third party advertising on our Services;
6. details of your interactions with our customer support representatives (e.g. transcripts of any chat conversations and call recordings);
7. information collected through tracking technologies such as cookies, pixels and web beacons, including information about websites you visit before and after visiting our websites, pages and advertisements you view, or links you click. This data does not generally identify individual people but does identify the internet browser. For more information about cookies and tracking technologies and how to block cookies, see

our Cookie Policy. Where we link this data with personal information we hold about you, such as where you have logged into a Service, we treat your information in accordance with this Privacy Policy;

8. information about how you use your broadband/home phone service such as:
  1. information about your call usage including the date, time and duration of your communications and your location;
  2. information about your data usage including the date, time and duration of your internet browsing, search queries, the websites visited and your location; and
  3. information about our network performance.

3.3. Information obtained from other sources. We may obtain information about you from the following other sources:

1. public databases, publications or public posts (including on social media);
2. information (e.g. your name, username, comments, likes, tweets, status, profile information and photos) from your social media services (e.g. Facebook, X), if you have permitted the service to share your information with us. If you access or log-in to our Services through a third party social media profile or link our Services to your social media profile, you authorise us to collect and handle your information in accordance with this Privacy Policy;
3. information from credit reporting agencies, law enforcement and fraud checking services;
4. commercially available personal, identity, geographic, demographic, and interest and preference information from data brokers, marketers and other analytics companies and advertising related organisations;
5. information from third parties where you have agreed with them that your information may be disclosed;
6. information from third parties who make their products or services available through our Services or third party applications that interact with our Services (e.g. search queries, voice commands or content you have viewed on a third party application and for how long);
7. information from third parties whose platforms we make our Services available through (e.g. a connected TV);
8. information from third party service providers who provide and administer the technology and operating platforms for our Services;
9. third party payment processors who collect payments for the Services on our behalf;
10. advertisers or ad networks and our trusted business partners with whom we offer co-branded services or engage in joint marketing activities;
11. information from third parties who collate information about you in order to derive insights about you;
12. information from third parties when you apply for a job or contract with us such as recruitment consultants, your previous employers, or other referees; and
13. information from our related companies, affiliates and other business partners in Australia or internationally.

#### 3.4. Other

We collect information about our suppliers and individuals employed by our suppliers (including service and content providers), contractors, dealers, agents and corporate customers, and their related companies. We will explain why we are collecting this

information and how we will use that information, unless it is obvious from the circumstances.

#### **4. How do we use your information?**

We, or our service providers, may use your information to:

1. Provide and administer the Services
  1. provide you with the Services;
  2. fulfill administrative functions associated with the Services (e.g. customer support, billing, payments, debt recovery and account management);
  3. respond to your enquiries, requests and complaints, and otherwise communicate with you (including on social media);
  4. assess your application or your credit worthiness for a Service and for other credit related purposes (including credit risk and bad debt reduction), as described in our Credit Reporting Policy (see section 6);
  5. verify your identity when you apply for our Services or for credit with us;
2. Monitor and protect our Services
  1. monitor your call usage and data allowance in relation to your broadband/home phone service;
  2. monitor and analyse your use of our Services, IT systems, network and infrastructure, including for security purposes or fraud detection and network traffic management, including under our Fair Use Policy for broadband and home phone services;
  3. protect against, identify and prevent fraud and other unlawful activity including a breach of any of our Services' terms and conditions;
3. Develop and improve our Services, marketing and advertising
  1. develop, measure and improve our Services and the products and services of our related companies, affiliates and business partners by performing research and data analysis of your use of the Services (including by measuring interest in our content and interactions with advertising) and by performing other data and statistical analytics. We may use third party analytics services (e.g. Google Analytics) and third party video measurement software (e.g. Nielsen and OzTAM) to assist with this;
  2. to improve the products and services (or any portion or component thereof) of our related companies, business partners and third party service providers in a manner that might be appealing to you;
  3. develop and improve, and measure the success of, our marketing and research, and to plan and execute our marketing strategies;
  4. measure the success of advertising on our Services;
  5. improve our Services by associating your browser and/or device with other browsers or devices you use for the purpose of providing relevant and easier access to content, advertising across browsers and devices, and other operational/business purposes;
4. Promote and Market
  1. promote and market our Services and the products and services of our related companies, affiliates and business partners;
  2. promote and administer our competitions, rewards programs, surveys, market research and events;
5. Deliver relevant content and marketing of our Services

1. improve your experience by, generating customised suggestions/recommendations and delivering tailored content on our Services, and personalising the marketing of our Services to you, in each case, that we think you will find relevant and interesting. To deliver this to you, we may link information collected by us under this Privacy Policy, (including through tracking technologies or software such as cookies and device IDs), with information we hold about you as a customer of one of our Services;
2. personalise the marketing of our Services to you on third party sites, applications or social media services, where we may match an anonymised common account identifier (such as a hashed email address) with third party sources to send you personalised communications (or to exclude you from receiving a particular communication) on the third party site, application or social media service;

You can control whether you receive personalised communications (see section 9).

6. Deliver relevant third party advertising on our Services – We may deliver personalised third party advertising on our Services. Personalised advertising (known as interest based advertising or addressable advertising) delivers you more relevant advertising based on your interests combined with other information (e.g. demographic and location information). Personalised advertising is tailored based on the information we hold about you as a customer and information collected about the use of our Services or your use of various sites or applications across the internet. We may also supplement this information with information collected from other trusted businesses with whom you have a relationship or from public sources. If you are using a browser, information collected through cookies or similar tracking technologies and software may be used to determine your likely interests and to deliver relevant advertising. If you are using a device that includes a resettable advertising ID, it may be used to determine your likely interests and to deliver relevant advertising. We may also use data connectivity platforms or other technologies to match an anonymised common account identifier such as a hashed email address with data from third party sources (e.g. third party advertisers) to deliver more relevant advertisements to you. We, our partners, third party advertisers, ad networks and technology providers also use the information for reporting and attribution, data analytics and market research. We may also share information with third parties to perform ad measurement services on our behalf.

You can control whether you receive personalised communications (see section 9).

7. Supplement your information and to derive customer insights
  1. derive customer insights about your characteristics, interests and preferences; and
  2. supplement it with additional information from publicly available sources, commercially available sources (e.g. data providers and advertisers), third parties with whom you have a relationship, and/or from our related companies, affiliates and business partners. We may share your information with these third parties so that they can do the same thing. Unless you have otherwise consented, where the information is provided to others for their own marketing purposes, it will not contain any information that personally identifies you;
8. Comply with contractual and legal obligations

1. fulfil our contractual obligations, including by entering contracts with you or third parties; and
  2. to comply with our legal obligations, including under the Broadcasting Services Act 1992 (Cth), the Telecommunications Act 1997(Cth) and Telecommunications (Interception and Access) Act 1979 (Cth), or any industry code or standard registered under an applicable law.
9. Other – We, or service providers acting on our behalf, may also use your information for any other purpose as notified to you at the time of collection, or where you have provided your consent, if permitted under the Privacy Act, APPs or applicable laws, or for any other purpose outlined in this Privacy Policy.

## **5. How do we share your information?**

We may share your information in the following ways:

5.1. With our related companies. We may share your information within the Foxtel Group and with our related companies including the News Affiliates (see section 14), or other companies under common control and ownership. Our related companies may use your information for similar purposes, or to deliver the Services jointly with us or on our behalf. If you do not wish us to provide your information to the News Affiliates for their own use, please contact us using the details below in section 13.

5.2. With our service and content providers. We may make your information available to certain third party service and content providers who assist us, or act on our behalf, to provide, develop, deliver, administer, manage, improve, promote, market and protect our Services, our IT systems and other business functions. This might include (without limitation) providers of technology and operating platforms for our Services, cloud services, data storage providers, website hosting services, channels, direct marketing services, market or consumer research services, data analytics and data matching services, data connectivity platforms, ad and audience measurement services, interactive or online advertisers, debt collection services (including other parties that assist with debt-recovery functions and purchasers of debt), billing and payment processors, identity verification services, fraud detection services, customer support contractors, human resources and IT consultants. We require our third party service and content providers who store, handle or otherwise process your personal information on our behalf, to adopt similar security measures. We also require them to use your information only for the purpose it was provided and in accordance with applicable laws.

5.3. For legal requirements and proceedings. We may disclose information to law enforcement authorities, national security agencies, statutory dispute resolution bodies (e.g. Telecommunications Industry Ombudsman), other government and regulatory authorities and other organisations as required or authorised by law, or in accordance with any industry code or standards registered under an applicable law (e.g the Telecommunications Consumer Protections Code), including in relation to investigating and resolving disputes or complaints concerning your Service. We may also disclose information if we believe disclosure is necessary or appropriate in connection with an investigation of suspected or actual fraudulent or illegal activity.

5.4. With our business partners. We may share your information with our third party business partners, including attributes in a de-identified manner for the purposes of personalising or excluding you from marketing communications. These may include (without limitation) partners who offer competitions, special offers or promotions with us, whose platforms we make our Services available through, who we collect money on behalf of, who jointly provide a program, channel, service, product or feature, or partners who provide a service or product

that operates in conjunction with (or interacts with) our Services such as a third party application, Google Assistant and Siri App Voice. The third party's use of your information will be governed by their own privacy policy. Where you have consented, we may also share your contact information with our business partners so they can send you marketing communications.

5.5. To protect our Services and users. We may disclose information to protect and defend the rights, interests and safety of our Services, our subsidiaries and affiliates, and their employees, contractors and agents; to protect the security and safety of our users of the Services, including when we believe disclosure is necessary or appropriate to prevent physical harm or financial loss.

5.6. For business transfers. We may disclose information in the event of a proposed or completed sale or transfer of all or a portion of our business or assets (including in the event of a reorganisation, dissolution or liquidation).

5.7. With social media providers. By logging in with or connecting your Services with your social media profile, you authorise us to share your information with the social media service provider, other users and your friends or followers. You understand that the social media service provider may handle this information in accordance with its own privacy policy. If you do not want your information shared in this way, please do not connect your social media profile with your Service and do not participate in social sharing on our Services.

5.8. Non-personal information. When the information collected from or about you is not defined as personal information under the Privacy Act, or we alter the information so that you can no longer be identified from the information, we may share such non-personal, de-identified or aggregated information with third parties at our discretion. For example, aggregated anonymous data may be sold or otherwise provided by us to third parties, including our related companies, affiliates, business partners, channel partners, analytics services, third party sites, applications or social media services, advertisers and ad networks. This may include de-identified information being provided by us to third parties for the purposes of targeting or suppressing you from marketing or advertising.

5.9. Other

We may also share your information for certain purposes with:

1. authorised representatives on your account for a Service;
2. credit reporting bodies or other credit providers for credit related purposes as described in our Credit Reporting Policy (see section 6);
3. telecommunication service providers or to our wholesale telecommunication provider in relation to the connection or disconnection of your Services;
4. the Integrated Public Number Database Manager where the information is used to do things like write phone directories and assist with the dispatch of emergency services;
5. our professional advisors and representatives (e.g. lawyers, accountants, auditors, corporate consultants or business analysts) to assist us with our corporate or business functions and to develop our business strategies; and
6. our independent contractors who provide us with services or who assist us with our corporate or business functions.

## **6. Credit reporting (our "Credit Reporting Policy")**

6.1. In some circumstances we may be a credit provider to you. We may collect 'credit information' (as defined in the Privacy Act) about you, from you and other sources and we may also disclose your credit information to a credit reporting body. Credit information is

personal information that has a bearing on credit that has been provided to you or that you have applied for. This information may include:

1. personal identification information (e.g. your name, date of birth, home or postal address and identification information);
2. details about information requests made about you to credit reporting bodies;
3. current and historical details about credit applications you have made and credit arrangements you have entered into;
4. information about your account (e.g. the date it was connected or frequency of payments);
5. information about unpaid or overdue amounts, default listings or credit infringements;
6. current and historical details about credit applications you have made and credit arrangements you have entered into;
7. credit scores or risk assessments indicating an assessment of your credit worthiness; or
8. other public information about your credit worthiness (e.g. bankruptcy proceedings and credit-related court judgments).

6.2. We will handle your credit information that we collect or that is disclosed to us, in accordance with the Privacy Act and this Privacy Policy. In particular, please refer to the following sections of this Privacy Policy:

- What information do we collect and how? (section 3)
- How do we use your information? (section 4)
- How do we share your information? (section 5)
- How to access, correct or update your personal information? (section 8)
- Disclosure of personal information overseas (section 10)
- Complaints (section 11)

6.3. We may use or disclose your credit information:

1. to assess your credit worthiness when you apply for a Service or in the management of the credit we provide;
2. to assist you to avoid credit defaults;
3. to collect amounts you may owe to us and to deal with serious credit infringements;
4. to assign or sell our debts or in connection with any securitisation or other financing arrangement;
5. to participate in the credit reporting system;
6. to deal with complaints relating to credit reporting or use of credit information; and
7. when required or authorised by law.

6.4. We may disclose credit information back to a credit reporting body, including in circumstances where your account is overdue or unpaid, or to list a default on your credit file. Upon such a disclosure, the credit reporting body may then include that information in credit reporting information that they provide to other credit providers to assist them to assess your credit worthiness. The credit reporting body that we deal with is Illion (Australia) Pty Ltd who can be contacted on [pac.austral@illion.com.au](mailto:pac.austral@illion.com.au) or [1300 734 806](tel:1300734806).

6.5. You may have the right to request that credit reporting bodies:

1. exclude you from pre-screening their direct marketing offers for consumer credit; or

2. not use or disclose your credit reporting information if you have been, or are likely to be, the victim of fraud.

## **7. How do we protect your information?**

7.1. We hold your information in a combination of electronic and hard copy files.

7.2. We have implemented a number of technical, administrative and physical security measures to ensure that the information we hold is protected from misuse, interference, loss, unauthorised access, modification or disclosure, by the use of various methods, including secure storage, encryption, firewalls, virus detection software, password restricted access and by training our staff to handle personal information in accordance with the Privacy Act, APPs, other applicable privacy laws and this Privacy Policy.

7.3. Where we store your information with a third party data storage provider, we require them to adopt appropriate security measures and to only use or disclose it for the purpose for which it was provided.

7.4. Please contact us immediately (see section 13) if you become aware or have reason to believe there has been any unauthorised access to, or misuse or loss of, your personal information.

## **8. How to access, correct or update your personal information?**

8.1. In accordance with your rights under the Privacy Act and APPs, you can request to access, correct or update your personal information held by us, by contacting us using the details below (see section 13).

8.2. Where you request access to your personal information, you may be charged an administration fee to cover our time and postage, handling, retrieval and other costs. We will try to respond to your request as soon as reasonably practicable. There will be instances where we cannot grant you access (e.g. where access would interfere with the privacy of others). If we refuse your request, we will tell you why. If you are not satisfied with our response, you can make a complaint in accordance with the procedure outlined below (see section 11).

## **9. Opting out**

We give you the choice of opting out of receiving certain communications and personalised messages such as addressable advertising.

For information on how to opt-out please visit the relevant Advertising Preferences and Opt-outs page:

- [Foxtel](#)
- [Hubbl](#)

## **10. Disclosure of personal information overseas**

The Foxtel Group and News Affiliates are part of a group of companies operating in Australia, the UK, USA, Canada, Hong Kong and Singapore. Some of our business functions, IT systems and Services are managed, administered or hosted by the News Affiliates and other third party service and content providers, from locations outside of Australia, including the UK, USA, Canada, New Zealand, Hong Kong, Singapore, Japan, South Africa, Israel, India, Kenya and the Philippines. We require our third party service and content providers who store, handle or otherwise process your information on our behalf, to protect your information from unauthorised use and disclosure, and to use your information only for the

purpose it was provided and in accordance with applicable law. However, your information may be accessed by the courts, law enforcement and national security authorities of the recipient country in accordance with applicable law. When you use the Services, communicate or interact with us, or provide your information to us, you consent to your information being transferred or made accessible to our related companies, affiliates and third party service and content providers located outside of Australia.

## **11. Complaints**

If you have any questions or concerns about this Privacy Policy or wish to make a privacy related complaint, you can contact us to make a complaint using the contact details below (see section 13). We will contact you promptly to let you know the next steps in resolving your complaint and to obtain any further information we need to consider your complaint. We will endeavour to respond to your complaint within 30 days of receipt of the complaint by our Privacy Officer (see section 13 for our Privacy Officer's contact details). If you are not satisfied with our response, you may refer your complaint to a relevant regulator, such as the Office of the Australian Information Commissioner. If your privacy complaint relates to our broadband/home phone services, you can elect to refer your complaint to the Telecommunications Industry Ombudsman.

## **12. Other Important Information**

1. **Linked services.** Our Services may be provided through or interact with third party platforms and our websites may contain links to other third party websites. We are not responsible for the privacy practices of these third party platforms or websites and you should check the privacy policy of that service or website to understand how it will handle your information.
2. **Data Retention.** Even after you cancel your subscription with us, we will retain your information for as long as we reasonably need it for the purposes outlined in this Privacy Policy. For example, we may retain your information to prevent fraud or to resolve a dispute, or we may retain your inactive account for a period for ease of resubscription. We may also retain your information if required or permitted by law, or to fulfil our contractual obligations to a third party. If you request, we may be able to delete or anonymise your personal data however, in certain circumstances, including where we are prevented by technical or systems constraints, we may not be able to remove all your information.
3. **Related Policies.** This Privacy Policy may be superseded or supplemented by another policy, statement, notice or terms of use, specific to a Service, survey, competition or program, or a company within the Foxtel Group (see section 14), as otherwise disclosed by us in our communications with you, or at the time of collecting your information.
4. **Sensitive Information.** We generally do not solicit or collect sensitive personal information (such as information about your racial or ethnic origin, religious or other beliefs, health, criminal background or trade union membership) and we ask that you do not provide us with this information. If you do provide us with any sensitive personal information, you consent to us collecting and handling that information in accordance with this Privacy Policy.
5. **Collection of personal financial information by a payment service provider.** Sometimes we allow you to use an unaffiliated payment service to purchase a Service. If you use a third party payment service, you will be directed to the webpage for that payment service. Any information you provide when using a third

party payment service may be collected and used by the payment service provider in accordance with that provider's privacy policy. You should check the provider's privacy policy to understand how it will handle your information.

6. Updates to this Privacy Policy. We may amend this Privacy Policy at any time. The effective date at the beginning of this Privacy Policy tells you when it was last updated. Any changes to this Privacy Policy become effective when we publish it online.

### **13. Contact Us**

If you have questions about this Privacy Policy, or to request a hard copy, please contact the relevant Privacy Officer at:

Foxtel:

Email: [privacy@foxtel.com.au](mailto:privacy@foxtel.com.au)

Mail: Privacy Officer, Foxtel Group, PO Box 649, Collins Street, West VIC, 8007

Telephone: [131 999](tel:131999)

Hubbl:

Email: [privacy@hubbl.com.au](mailto:privacy@hubbl.com.au)

Mail: Privacy Officer, Hubbl, Locked Bag 9000, Crows Nest, NSW, 1585

### **14. Key Definitions**

Foxtel Group means NXEA Australia Pty Limited (ACN 625 190 990) and each of its subsidiaries in Australia, including but not limited to, Foxtel Management Pty Limited (ACN 068 671 938), Foxtel Cable Television Pty Limited (ACN 069 008 797), FOX SPORTS Australia Pty Limited (ACN 065 445 418), and Hubbl Pty Limited (ACN 072 725 289).

News Affiliates means News Limited (ACN 007 871 178) and each of its related companies in Australia and internationally and other companies under common ownership or control (other than a company within the Foxtel Group).

Services means the product/s and/or service/s supplied by the Foxtel Group which you apply for, purchase, subscribe to, use or interact with including our devices (such as set top boxes, modems, TVs and pucks), websites (and chat functionality), applications and social media sites.