**ACO PRIVACY POLICY**

*Updated July 2019*

At the Australian Chamber Orchestra (ACO), we respect your privacy. We respect the rights of our individual customers, suppliers and colleagues to decide when and how their personal information is used. We are bound by the Australian Privacy Act and the General Data Protection Regulation (GDPR). We will protect your information in accordance with those laws, including the Australian Privacy Principles (APPs) and, where applicable, with additional requirements under the GDPR. The APPs and GDPR regulate how we collect, use, disclose and store personal information.

Our commitment to privacy is based on:

1. The freedom to visit our website and access most information without the need to give us any personal information; and
2. A pledge that any personal information given is kept safely and securely, using appropriate technology and to accepted industry standards.

The ACO website

The ACO website is designed to provide visitors with easy online access to information about the products and services we have to offer. It also provides support for our customers and business partners. Much of the content of this site is given freely, and can be viewed anonymously.

What kind of information do we collect and hold?

*Information we collect from you*

The information we collect from you when you sign-up for our newsletter, order tickets to a performance, enter a competition advertised by us, donate directly to the ACO, donate to ACOUK Limited or ACOUS Inc, or contact us with any other request, query or complaint may include:

* your name;
* postal address;
* email address;
* telephone number(s);
* your location or locations you’re interested in seeing performances;
* gender;
* age or age range;
* credit card or other payment details;
* any information you provide us about special requirements (such as access needs); and
* any information you provide to us in enquiries.

If you don’t provide some or all of this information, we may not be able to provide our services to you effectively or at all, or respond effectively to your request, proposal, query or complaint.

Information we collect from job applicants and from any individuals who propose to provide services to the ACO varies, but may include:

* your full name;
* residential address;
* telephone number(s);
* email address;
* gender;
* details about your qualifications, skills and employment history;
* copies of qualification certificates or memberships of professional bodies;
* information about your current salary level;
* your citizenship status and/or right to work;
* whether you have a disability that we may need to accommodate;
* information from referees provided by you;
* links to your professional profiles (e.g. LinkedIn or corporate website);
* whether you have any criminal convictions.
* company name (where applicable);
* postal address;
* your ABN or other applicable tax information;
* banking or payment information; and
* video or audio recordings of your musical capabilities or other samples of your work.

If you don’t provide some or all of this information, we may not be able to respond effectively to your request, application, proposal, query or complaint.

*Information from our interactions with you:*

Whenever you interact with us, we hold information about those transactions. The types of information we store include:

* the history of your enquiries and communications with us;
* the history of your enquiries and communications with ACOUK Limited or ACOUS, Inc (or both of them);
* information about your subscription(s);
* your donation and sponsorship history;
* the history of the services you supplied us; and
* your booking history.

ACO may also receive and record information when you visit our website from your internet browser, including statistics on page view, traffic to the ACO website, IP address, referral URLs and web log information.

The ACO also offers a quick ‘Guest Checkout’ functionality, allowing visitors to transact online without logging in by providing only the personal information required for their purchase. The data collected in these transactions will be held under our standard processes, and where possible will be matched with any previous purchases in an effort to provide as complete a record of transactions as possible.

*Information from other sources:*

In addition to information you submit to us directly, we may collect your personal information through authorised third-party ticket vendors. If you book through a third-party ticket vendor, the vendor’s terms of use and privacy policy will also apply.

We may verify your personal information, such as your postal address, against public or third-party data sources, such as post office databases, to ensure accuracy.

We may collect personal information about you from references you supply as a job applicant or supplier to the ACO. We may obtain your personal information from recruitment agencies who you supplied information to. We may obtain publicly available information about you, such as from LinkedIn or a corporate website.

How do we hold personal information?

Personal details collected by the ACO are stored in databases on secure servers, protected from unauthorised access. Some of this data is shared among a consortium of other Australian Arts Organisations (see section outlining the sharing of personal information below). The Data is protected by industry standard security measures and used according to systems and procedures designed to ensure that personal information the ACO holds is protected from misuse, loss, unauthorised access, or modification. We will take all reasonable steps to ensure that the information we hold about you is secure, accurate, complete and up to date.

How do we use your personal information?

The ACO may use the personal information it collects for the following purposes:

*Performance of a Contract:*

When you book tickets, make a donation to the ACO, or agree to provide us services you enter into a contract with us. When you make a donation to ACOUK Limited or ACOUS, Inc we will provide all administrative services in relation to that donation on behalf of ACOUK or ACOUS. To enable us to perform our contractual obligations, or the obligations of ACOUK or ACOUS, we may need to use your personal information. For example, providing you with services you have requested, processing transactions, contacting you if there is an issue with your transaction, contacting you if an event is cancelled or changed, sending you confirmation of purchases, receipts and tickets, ensuring venue access for special needs, and responding to enquiries. If you provide us your mobile number, we may provide SMS updates about changes to your performance, or remind our season ticket holders about the release of their seats. This service is not available for landline telephone numbers. Where we acquire services from you, we need to use your personal information to communicate with you, ensure the services are performed, and pay the agreed remuneration.

*Legitimate Business Interests:*

In some circumstances, we may collect and process your personal information for our legitimate organisational interests. We will not do so where there is an overriding prejudice to you by using your personal information in this way. We may use your information to compile visitor profiles to improve products and services for our customers, for direct marketing purposes (see below), to undertake research and analysis of our audience preferences and characteristics (including profiling), to improve the relevance of the content displayed to you online through content personalisation (see below) and for system administration, protection and maintenance.

We may use your personal information for legitimate procurement or recruitment purposes, for example to verify whether you are a suitable candidate or supplier, to communicate with recruitment firms, or for related human resources and procurement practices.

If you contact us with a request, query or complaint, we will use the personal information you provide to us to respond to your request, query or complaint.

*With your Consent:*

Except when using your personal information for legitimate business interests or to perform our contractual obligations, we will seek your explicit consent before using your personal information.

How we share your personal information:

ACO may disclose the information we collect from you as follows:

* ACO Affiliates and Partners – we may share your personal information with our affiliated companies and international partners, including ACOUK and ACOUS;
* Australian Arts Partners – Your personal information is included on a database that is a customer relationship management system which is shared by the ACO and its Australian Arts Partners (currently being the Sydney Opera House, Bell Shakespeare, Opera Australia and Pinchgut Opera) who use a common customer relationship system for the purpose of ticketing, marketing, fundraising and customer relationship management. The Australian Arts Partners are able to view your name and contact details (e.g. address, email and phone numbers) when those details are given to the ACO and entered on the database (“Contact Information”). This is so the ACO can process your current and future transactions as effectively as possible without asking you to provide the same information repeatedly, and also helps ensure the speed and efficiency of any of your dealings with the Australian Arts Partners.
* Performance venues – we may share your contact information with venues at which the ACO performs;
* Our patrons – we may publish your name and details of your patronage when you make a large donation and opt in to being acknowledged;
* Service providers – we share your personal information with third party service providers who provide website assistance, conduct mailing-out services, payment and technical support functions, or who otherwise administer activities on our behalf;
* Legal Matters & Safety – we may share your personal information as permitted or required by law, including to provide information to law enforcement or regulatory agencies investigating matters;
* Sale or Transfer of Business – in the event our business is sold or disposed of, whether by sale of assets, merger or otherwise, or in the event of insolvency, your personal information may be an asset sold or merged in connection with that transaction;
* Recruitment or third-party agencies and references – we may disclose your personal information to recruiters who provide your information to us, to third party references you’ve provided us, and to enable verification and background checks for job applicants and service providers;
* Banks or financial institutions – we may disclose your information to financial institutions for example to enable a refund to be processed, or for the payment of salaries or fees we owe to you;
* Events and travel purposes – when we are organising travel on your behalf, e.g. if you are a service provider travelling with the ACO or a prize winner, we may disclose your personal information purpose the purposes of transport, hotel bookings and visa processing; and
* With your permission – we may provide your personal information to any other third party with your express consent or as necessary to deliver a service or respond to a request, query or complaint from you.

International Transfer:

When you use our services, some of your personal information may be transferred to other ACO group entities. If you are located in the UK or EU, your information may be transferred outside of the European Economic Area (EEA) to countries that do not have the equivalent data protection laws to the EEA, including Australia. We may also engage service providers outside the EEA. When we transfer your personal information outside your country of residence, we take steps to ensure that your information is secure.

Marketing and Communications:

*Cookies and Similar Technologies*

ACO uses cookies and similar technologies to provide the website service, direct specific content to you and access your information when you access our site.

*Website Analytics*

The ACO uses Google and Sitecore Analytics, industry standard analytics platforms, to collect and aggregate usage data about our website visitors, including, among other things, details of the pages visited, length of time on page, landing pages, exit pages and sources. The data collected within Google Analytics is fully anonymised, and the ACO do not join this usage data with your personally identifiable information. The Data Collected in Sitecore Analytics can be tied to individual account IDs.

The ACO also use Facebook’s Pixel to track the effectiveness of actions on Facebook and its partners. These activities can be associated to key actions (such as a click on an advertisement or the making of a purchase on our website), but cannot be linked to personally identifiable information by the ACO.

*Personalisation*

Based on previous activity with ACO such as purchase history, donation history (including to ACOUK and ACOUS), or browsing data, or known information such as your device's geolocation, this website will sometimes display personalised information to enhance your experience, such as reminders for upcoming performances or relevant local performances displayed by default. This personalisation is carried out with the intent of improving the quality and ease of the ACO website experience for the visitor. If you do not wish to have your experience personalised based on previous dealings with the ACO, you can opt out of personalisation in your ACO account.

In the course of providing personalisation, this website may 'device match', sharing usage information of multiple devices known to be associated with your account and personalising accordingly. If you have opted out of personalisation, then no personal data is shared during this device matching.

*Remarketing*

We and assigned marketing agencies will use Google Analytics remarketing codes and Facebook Remarketing Pixels to capture cookie data of our visitors. These are used to record instances where visitors view certain pages or take certain actions on a website. This will later enable us to offer targeted advertising through Facebook, AdWords and any partner channels. If you do not want to be a recipient of targeted advertising, you can opt out through the DoubleClick opt-out page or the Network Advertising Initiative opt-out page. Assigned agencies are only provided the data through the platform, which means it is anonymised and cannot be shared externally.

*Mail, SMS and Telemarketing*

From time to time, our marketing arm may send printed, SMS or telephone information about upcoming performances, seasons or providing special offers. You can choose to opt into or opt out of these communications at any time as outlined below.

Members of our philanthropy team may also use these platforms to extend their thanks to donors and partners, or inform their database of new donation opportunities.

Previous suppliers or job applicants may receive communications from us about upcoming positions available or services required by the ACO.

Individuals who do not want to receive correspondence via Mail, SMS or Telemarketing can opt out by contacting our Box Office on 1800 444 444 (or +61 2 8274 3800 from outside Australia) during standard business hours, or by emailing boxoffice@aco.com.au at any time.

*Emails*

The ACO maintain an active email marketing program, which is delivered with a view to providing our audience with the most relevant information, offers and events to them based on geography, previous purchases or frequency of engagement. You may opt into the program during purchase, or sign up to the program at the base of most pages on the website (including this one). Those who have opted-in can manage their preferences or opt out entirely by clicking the ‘Manage Your Preferences’ link at the bottom of the email in question, or by <logging into their ACO account> and updating their preferences.

Links to other sites

The ACO cannot take, and accordingly does not assume, responsibility for the privacy policies, conduct or quality of third-party websites linked to from our site. You should check the privacy policies of any third-party site before disclosing any personal information.

Managing your personal information

If you would like to access the personal information we hold about you, or have it corrected, edited or entirely removed by the ACO, you can make a manual request through our Box Office by calling 1800 444 444 (or +61 2 8274 3800 from outside Australia) or emailing boxoffice@aco.com.au. You can request a copy of the information we hold about you in a portable format.

Where we process your personal information, you can withdraw your consent at any time, exercise your rights to object to processing based on legitimate interest, and ask us the source of personal information held and whether it came from publicly accessible sources. You can also object to us using your information for direct marketing purposes.

Note that exercising your right to be forgotten by requesting a removal of personal data may result in the ACO being unable to fulfill our standard service terms, such as to reissue tickets or initiate seat changes.

If you require any further information about how we handle your personal information or you have any other privacy related question or complaint, you can contact us using the details below. If your query is not resolved, you have the right to complain to a privacy protection authority.

Changes to our policy

The ACO reserves the right to change this policy at any time, and changes are likely as our website develops over time. We therefore encourage you to review this page regularly.

Contact Details

Please contact us if you would like to access your information, or if you have any further questions or concerns about your privacy, and our conduct online.

For Australia:

The Data Protection Officer
Australian Chamber Orchestra Pty Ltd
Opera Quays, 2 East Circular Quay, Sydney NSW 2000
PO Box R21, Royal Exchange NSW 1225
ABN 45 001 335 182

Telephone +61 2 8274 3800
Fax +61 2 8274 3801
Email aco@aco.com.au

We will respond to your enquiry within a reasonable time. If you are not satisfied by our response you may contact the Office of the Australian Information Commissioner (Tel: 1300 363 992 or email: enquiries@oaic.gov.au).