

PRIVACY POLICY

Mandurah Performing Arts Centre (ManPAC) respects the privacy of its patrons and is committed to protecting their personal information and complying with its obligations under the Privacy Act 1988 (Cth) and the Privacy and Responsible Information Sharing Act 2024 (WA) (PRIS Act).

Personal information is information such as name, contact details and records of the patron's dealings with us and may include online account details, transaction records, marketing preferences, survey responses and other information that reasonably identifies an individual. This Privacy Policy explains how we handle personal information and the ways in which we can be contacted about the personal information that we hold.

PURPOSES FOR HANDLING PERSONAL INFORMATION

ManPAC collects, holds, uses and discloses personal information for the following purposes:

- To interact with patrons
- To carry out transactions, such as to process payments
- To maintain our business records
- To provide information about activities and events that may be of interest to patrons.
- Any purpose disclosed to which patrons have consented.
- Any purpose that you would otherwise reasonably expect to run our business.
- Any purpose required or permitted by law
- To create and manage patron accounts, ticketing records and customer relationship management records, including through Spektrix or any replacement ticketing or CRM platform.
- To manage bookings, exchanges, refunds, access requirements, customer service requests and venue operations.
- To administer donations, memberships, competitions, surveys, feedback forms, venue hire enquiries and other patron or stakeholder interactions.
- To analyse attendance, engagement, website use and marketing performance so that ManPAC can improve its services, programs and communications.
- To meet safety, security, insurance, audit, reporting, governance and funding obligations, including obligations connected with the City of Mandurah where relevant.

COLLECTION

ManPAC collects personal information from our patrons whom we deal with. We only collect personal information by lawful and fair means. We collect personal information through our interactions with patrons, such as when purchasing a ticket for a performance, when we communicate by phone, mail, email or when entering personal information on our website.

This may include information collected through Spektrix, our website, newsletter sign-up forms, contact forms, donation forms, surveys, competitions, venue hire enquiries, event attendance, access requirement requests and other digital or paper-based forms.

Where reasonable and practicable, ManPAC will provide a privacy collection notice at or before the time personal information is collected. This notice will summarise why the information is being collected, how it will be used, who it may be disclosed to, whether any information may be disclosed or stored overseas, the consequences of not providing required information and where this Privacy Policy can be accessed.

Where ManPAC collects information for marketing purposes, consent to receive marketing communications will be separate from the information required to process a ticket purchase or provide a requested service.

DISCLOSURE

ManPAC will not sell, share or rent any personal information to third parties, except as specified in this Privacy Policy, or for a purpose that patrons would reasonably expect, that is required or permitted by law, or for which consent has been provided.

ManPAC may disclose personal information to third parties, such as:

- Our service providers (including ticketing services, mailing houses, etc.)
- Our professional advisers, including lawyers, accountants and auditors.
- Government, regulatory and law enforcement authorities
- Promoters (venue hirers) when patrons have consented to receive marketing materials from Promoters.
- Ticketing, payment, CRM, email marketing, website hosting, data storage, analytics, IT support and database service providers, including Spektrix and associated service providers used to deliver ticketing and patron communications.
- The City of Mandurah where required or reasonably necessary for governance, venue operation, funding, reporting, audit, safety, security, legal or contractual purposes.
- Artists, presenters, promoters or presenting companies where this is necessary to deliver an event or service, or where patrons have expressly consented to receive direct marketing from those parties.

ManPAC holds personal information on a secure database. The database provider may occasionally need to access any database to provide its service to us. Some service providers may store or process personal information outside Australia. Where this occurs, ManPAC will take reasonable steps to ensure appropriate privacy and security protections apply.

ACCURACY

ManPAC takes reasonable steps to ensure that the personal information that we collect, hold and use is accurate, up-to-date and complete, and that the personal information that we disclose to third parties is also relevant.

As such, we encourage patrons to contact us if they believe that any of the personal information that we hold is inaccurate, outdated, incomplete, irrelevant or misleading. Patrons may request that we correct such personal information by contacting us with the details provided below.

ManPAC will respond to all requests to correct personal information. We are not obliged to correct any personal information if we do not agree that it requires correction and we may refuse to do so. If we refuse, we will provide the patron with a written notice explaining the basis for our refusal.

SECURITY

ManPAC holds personal information in both paper-based and electronic files. Electronic information is stored on secure servers that are protected in controlled facilities. In some cases, these facilities may be overseas.

ManPAC seeks to ensure that personal information that we hold is protected from misuse, interference and loss caused by unauthorized access, modification or disclosure. Our employees and agents are obliged to treat any personal information held by us confidentially. ManPAC will also take reasonable steps to ensure staff, contractors and relevant service providers handle personal information in accordance with applicable privacy obligations and ManPAC policies.

In the case that private and sensitive information is disclosed without appropriate authority, the CEO and relevant members of the Executive Team will immediately meet to undertake the following:

- Gather all facts and information in relation to the unauthorised disclosure.
- Assess the risks in relation to the unauthorised disclosure.
- Determine any mitigation steps that may need to be urgently actioned to reduce further harm.
- Determine if there has been a breach of this policy.
- Determine a response in relation to the unauthorised disclosure, including but not limited to informing the subject of the private and sensitive information, reporting to the Board of Management, and/or any improvements that need to be made to prevent future unauthorised disclosures.
- Determine whether the incident is an eligible data breach or serious information breach requiring notification to affected individuals, the Office of the Australian Information Commissioner, the Information Commissioner of Western Australia, the City of Mandurah, insurers, funders or other relevant bodies, where required by law or contractual obligation.
- Record the incident, decisions made, notifications given and any corrective actions implemented.

OUR WEBSITE

ManPAC's website utilises "cookies", which are pieces of data that are stored on website visitors' hard drive containing details about your use of our website. Use of cookies does not provide us with information about patrons that can be used to identify them, rather, they anonymously track usage of our website, so that we can enhance users' experience of our website. Website Visitors may elect to reject cookies and still use our website. Some website functionality may be affected if cookies are disabled.

ManPAC allows certain Promoters to utilise marketing tracking through Facebook Pixels or Google Tags on our website to receive aggregate data about their events. ManPAC may also use website analytics, social media pixels, advertising tags and similar technologies to understand website use, improve patron communications and assess the effectiveness of campaigns. Where required, these tools will be managed in accordance with applicable consent, preference and privacy requirements.

ManPAC also use IP addresses to analyse trends, administer our website, track use movements on our website, and gather broad demographic data for aggregate use, which we may share with our partners and advertisers. We note that IP addresses are not linked to any information that could identify the website visitor.

Where patrons provide personal information through the website, such as by signing up to newsletters, making enquiries, completing forms or purchasing tickets, ManPAC will provide a collection notice at the point of collection wherever practicable.

MARKETING

ManPAC may use the personal information that it holds about patrons, including contact details, to provide patrons with information about activities, events and products that may be of interest to you, or to seek donations for our activities. Patrons may opt out of receiving all or certain types of marketing information from us at any time by contacting us with the details provided below. Patrons may also unsubscribe using the unsubscribe link included in electronic marketing communications where available.

In addition, when patrons create an account with us, and during many ticket transactions, we will also ask whether you would like to receive news and offers from us and our Promoters. If you agree to receiving news and special offers information from ManPAC, you agree that we may send you marketing communications (including via social media). The preference to receive or not receive marketing will continue to apply until changed by the patron. Consent to receive marketing from ManPAC will be requested separately from any consent to receive marketing from promoters, presenters or other third parties.

If patrons agree to receiving marketing information from Promoters, you agree that they (including where applicable Performing Arts Companies) may contact you directly for marketing purposes. Patrons are not required to consent to promoter marketing to purchase tickets or receive ManPAC services.

Generally, if third parties have received your personal information, their handling of your personal information will be governed by their privacy policies. In some cases, it may also be necessary for patrons to contact the relevant organisations to notify them of their decision.

ACCESS

If a patron wishes to gain access to the information that ManPAC holds, contact us on:

Mandurah Performing Arts Centre
PO Box 1049, Mandurah WA 6210
08 9550 3900 - manpac@manpac.com.au

ManPAC will respond to all requests for access. On the rare occasions when we refuse access, we will provide a written notice stating our reasons for refusing access and the provisions of the Privacy Act on which we rely to refuse access. We may seek to recover the reasonable costs that we incur by providing you with access to any of the personal information that we hold. Where applicable, ManPAC will also consider any access, correction or privacy rights arising under the PRIS Act.

QUESTIONS AND COMPLAINTS

Patrons who have any questions, concerns or complaints about the way in which we have handled your personal information or believe that Privacy Policy we have not complied with our obligations under the Privacy Act, may contact us with the details provided above.

ManPAC will take privacy complaints seriously and will aim to respond in a timely, fair and transparent manner.

Patrons may also lodge a complaint with the Office of Australian Information Commissioner by calling 1300 363 992 or sending an email to enquiries@oaic.gov.au. Where the PRIS Act applies, individuals may also have rights to raise privacy matters with the Information Commissioner of Western Australia.

CHANGES TO MANPAC'S PRIVACY POLICY

ManPAC may amend this Privacy Policy at any time without giving notice to patrons. The most current version will be made available on the ManPAC website. Where changes are material, ManPAC may take reasonable steps to notify affected patrons or stakeholders.