

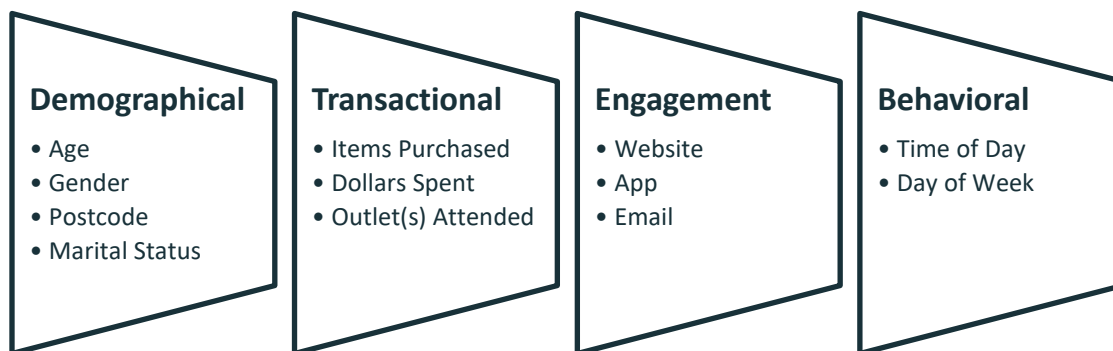
ETHICAL PERSONALISATION

Norths Collective works to ensure our communication activities are ethical while remaining effective. We use data to guarantee our messaging is relevant, accurate and timely.

This document helps to outline our four pillars of ethical personalisation which form the foundation of how we use data to ensure our communications and related activities are undertaken through an ethical lens.

FOUR TYPES OF DATA

There are four main types of data that Norths Collective uses to communicate.



These types of data are used together to personalise our communication to each individual person, ensuring we remain relevant and offer timely information to grow engagement with Norths Collective venues.

We capture Demographical data at the point a new member joins Norths Collective, including our fitness centres or a non-member books a table at a venue, buys tickets to an event, or books a private or corporate function with us.

We capture point-of-sale transactional and behavioral data when a member elects to use their membership card when transacting with a Norths Collective venue.

We also capture data through other channels such as ticketing and fitness subscriptions and we match people based on unique identifiers such as name and email or mobile number.

We capture engagement data through our digital channels and their associated technologies.

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PILLAR 1 - TRANSPARENCY

At the time of becoming a member, all information being entered is clearly labeled and our Privacy Policy displayed. It is at this point that we capture all of our demographical data which is made up of the following key data points: Name, Date of Birth (Age), Address, Gender, Marital Status, Mobile, Email, Occupation

All of our commercial Email and SMS communications include subscription preference and unsubscribe links. These allow customers to have complete control over what communications they receive from our venues as well as the ability to unsubscribe if they wish. It is important to note that Transactional emails wont have an unsubscribe option as they are not classified as commercial emails, these are generally notices of renewal of membership or legal communications including but not limited to a Notice of Annual General Meeting.

PILLAR 2 - TRUST

Following on from transparency, trust is a value that Norths Collective holds true. We build trust through the ethical collection of data as outlined above as well as how we treat our people data.

We use Salesforce as our Single Source of Truth and Marketing Platforms. We chose to partner with Salesforce for their innovative approach to technology as well as their strong company values, of which number one is Trust. Salesforce has a strong security ethos and has many layers that ensure our data is secure. These layers include:

- **Secure Socket Layer Technology** – When accessing data on web this technology ensures that a users session is protected from Cybercriminals. This is the most advanced technology for Internet security available today.
- **Multi-Factor Authentication** – All users at Norths Collective automatically have this authentication activated. Put simply, if a user wants to log into our Salesforce instance on web, they must have a secondary source such as an authentication app on their phone to verify their identity each time or else their login attempt will fail.
- **Secure Hosting Environment** – Salesforce is hosted in a secure server environment that's uses a firewall and other advanced technology to prevent outside intruders accessing data. Servers that house our data are located only in Australia and not overseas
- **trust.salesforce.com** – This website is accessible to the public and is owned and managed by Salesforce. It provides transparent status details on service availability, performance, security, privacy, and compliance.

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PILLAR 3 – PERSONALISING USING DATA

We use a combination of the data points mentioned earlier to deliver personalised marketing. Through combining these data points we can build individual engagement profiles, allowing us to truly understand what content a person would be most likely to engage with. From here we can communicate with each member individually across all digital channels including Email, SMS, Web, App & Social.

An example of this can be seen below:

Jacqueline is a fictional member of Norths Collective. She attends The Greens North Sydney on Friday night with work colleagues and purchases a schooner of beer and a salad. Her husband, Tom visits Norths Cammeray on Saturday with some friends, he purchases a glass of shiraz and a steak while watching the football.

The next week Jacqueline and Tom both receive an email from Norths Collective with upcoming events and promotions. Both have a slightly different approach to the content, with Jacqueline's email headlining an upcoming beer promotion with a trip to a brewery for four friends to be won, while Tom's email features the Red wine of the Month promotion coming up at another of the Norths Collective venues.

This is just a small example of how we used those two customers transactional and engagement data to deliver a personalised message to them individually, ensuring the messaging remained relevant.

PILLAR 4 – CONSIDERING INTENT BASED ON BEHAVIOUR, NOT JUST ATTRIBUTES

As seen in the example above we didn't send a message about wine to Jacqueline because she was female or a message about beer to Tom because he was male, but rather because they had purchased these products during their visits.

We believe it to be important that we don't always target our messaging based on an individual's personal or physical attributes but rather their digital and in-venue behavior. This ensures that we are treating each customer respectfully and ethically when developing communications to them. It also helps us ensure that customers remain engaged with our business through relevant messaging.

We also want to ensure we don't miss any individuals of whom a message may be relevant. For example, if we were sending out a bingo communication and we stereotyped our customers based on age, we may choose to send to just those who are 65 and older. However, we now use transactional and behavior data to target anyone who has purchased from the Department 'Bingo' in the past 18 months. This will give a more accurate end result and ensures we capture all relevant customers.

ETHICAL PERSONSALISATION

DOCUMENT CONTROL

Policy name	Ethical Personalisation Policy
Approved by	Chief Marketing & Innovation Officer
Date approved	April 2024
Frequency of review	Every two years
Last reviewed	April 2024
Next review date	April 2026