

Tracking and Targeting Policy

Tapt Media Pty Limited (ACN 063 906 927) and its related bodies corporate, partnerships and joint venture entities (we, Tapt Media, us or our) collect Metadata (as defined here in our **Privacy Policy**) about your browsing activity on our digital services (which includes our websites and apps).

1. How we Track and Use Metadata

We may also use the Metadata that we collect about you on our digital services to identify you on third party websites where we have an arrangement in place to serve ads on those third party websites. We may also collect Metadata from third parties.

One of the reasons we collect Metadata is to display targeted advertisements or content on our digital services and also on third party websites. For that purpose, Metadata is collected and assigned to one or more pre-defined categories (for example “buyers”). If this infers a particular interest, a cookie is placed in your web browser which may determine the type of targeted advertising or content that you receive. We target advertisements and content in order to improve your user experience – so that you are served advertisements and content that we believe may be more relevant or useful to you.

To create consumer profiles, we also collate data from other sources across our digital services including site surveys and competitions. We will only use this data in accordance with the *Privacy Act 1988 (Cth)* (**Privacy Act**), our Privacy Policy and other applicable laws.

Advertisements or content may also be “targeted” to users and user profiles created based on:

- the type of content displayed on a given web page;
- the geographical location of a user (i.e. identified by an IP address);
- specific searches undertaken by a user; or
- the type of customer (e.g. account holder versus browser).

Other reasons we may collect Metadata include:

- to limit the number of times users are served certain ads;
- to monitor the performance of advertising campaigns;
- to audit, research, and analyse usage in order to maintain and improve our services, and to develop new services;
- to ensure that our ad-serving technologies function properly; and
- to provide you with recommendations, based on your usage patterns.

We will not collect Metadata or target advertisements based on the following market segments:

- racial or ethnic origin;
- political opinions;
- membership of a political association;
- religious beliefs or affiliations;
- philosophical beliefs;
- membership of a professional or trade association;
- membership of a trade union;
- sexual preferences or practices;

- criminal record;
- health information; or
- genetic information that is not otherwise health information.

If we ever seek to target advertisements based on the above market segments, we will first obtain your express consent. We will not create categories designed to target children under the age of 16 years (however, this does not prevent us from marketing children's products to an adult audience).

2. Cookies

What is a cookie?

A cookie is a small text file that is placed on your device (such as your computer, smartphone or other internet-enabled device) when you visit a site or page to collect data about the usage of our app or website at a later date. The cookie will help the website, or another website, to recognise your device the next time you visit the site. Most web browsers are set by default to accept cookies.

In addition to cookies, we also use web beacons and other storage technologies to collect information from our websites and apps. Like cookies, web beacons and similar storage technologies collect data about the usage of our websites and can recognise your device the next time you visit.

Why we use cookies

We use cookies to personalise your browsing experience (for example, by remembering your preferences and recognising you as a repeat visitor to our digital services), and to track statistics about the usage of our digital services. This allows us to better understand you (including valued members) and improve the layout and functionality of our websites and apps. This tracking is generally conducted in such a way as to ensure your anonymity. While the cookie may identify your computer, it should not identify you unless you have a registered Tapt Media account. In that case, the cookie will be linked to your profile so that we can identify you and provide more relevant content.

The types of cookies we use

- **Strictly necessary cookies** that are required for the operation of our digital services, such as cookies that enable you to log into secure areas of our network or to comply with the law (for example, to keep your information safe). If you opt to disable these cookies, you may find that certain sections of our network do not work properly for you (for example, you may not be able to access all of the content that membership entitles you to access).
- **Performance cookies** which recognise and count the number of users to our digital services and help us see how users move around our digital services. These cookies do not collect information that identifies you. We only use such information to improve our network. This information helps us to find out how well our digital services are working and highlights where it can be improved.
- **Functionality cookies** which are used to recognise you when you return to our digital services and assist us to personalise your content and digital services experience by remembering your preferences. These cookies are also used to provide services you have asked for. Information collected by functionality cookies may or may not be anonymised, but they cannot track your browsing activity on other websites.
- **Targeting cookies** which are used to record your visit to our digital services, the pages/apps/content you have visited and the links you have followed.

Session and Persistent Cookies

Our digital services may place session and persistent cookies on your device. Whereas the difference between a first party and third party cookie relates to the party controlling the initial placement of the cookie on your device, the difference between a session and a persistent cookie relates to the length of time the cookie lasts. Session cookies are cookies that typically last for as long as you are using your browser, or browser session. When you end your browser session, the cookie expires. Persistent cookies, as the name implies, are persistent and will last after you close your browser. This allows for quicker and often more convenient access to our digital services.

3. Device ID

A device ID is a string of numbers and letters that identifies an individual smartphone or tablet. It is stored on the mobile device and can be retrieved by any app that is downloaded and installed. Apps typically retrieve the ID for identification when talking to servers. Depending on your operating system, the device ID may be used as the identity which advertisers, marketers and other services will track when looking for a particular type of device. Most handsets allow you to view or reset your device ID and/or opt out of ad personalisation. For more information, please refer to your handset manufacturer's website.

How do we use device IDs?

We use device IDs to identify mobile users where cookies may not be available. The use case for device IDs is similar to cookies, they give us a better understanding of our users so we can improve the layout and functionality of our products and serve more personalised advertising.

4. Third party cookies and technologies

Third party cookies are cookies that are set by a URL other than the one being visited by you. If you visit our website and a separate company sets a cookie through that website this would be a third party cookie. Third party advertisers purchase advertising products from us that enable them to target particular types of users of our network, for advertisements served both on our network and also on third party websites.

We also permit advertisers to embed their own cookies in advertisements and we allow other third parties to use cookies and other tracking technologies on our digital services. Generally, advertisers will embed cookies in advertisements to monitor the performance of their advertising campaign, but they may also collect Metadata relating to browsing activity on our digital services. We encourage advertisers to have a privacy policy that outlines their data collection activities and usage. Please refer to such third party privacy policies for more information.

We will not provide any personal information to an advertiser or any other third party without your express consent or in accordance with our Privacy Policy.

The table below sets out in more detail examples of the types of cookies and similar technologies we use and what we use them for, including for advertising purposes, analytics, or to track or record user engagement.

Third-party	Services	Privacy Policy
Google	Google provides us with ad serving and ad exchange services. Anonymous aggregated user data collected and processed by us may be shared with Google to make the advertising you see our digital services more relevant to you.	Google
Magnite	Magnite provides us with ad exchange services. Anonymous aggregated user data collected and processed by us may be shared with Magnite to make the advertising you see on our digital services more relevant to you.	Magnite

We have implemented several technologies such as Google, Triton, Adswizz and survey and promotion management tools on our Platforms to collect data related to the demographics and interests of visitors to our Platforms.

You can opt out of the Google Analytics' Demographics and Interest Reporting tool by clicking [here](#).

Some of our Platforms also use Nielsen proprietary measurement software, which allows you to contribute to market research and audience ratings services. We cannot identify you from this information. To learn more about this software and your choices in relation to it, Nielsen Digital Measurement Privacy Policy at <http://www.nielsen.com/digitalprivacy>.

5. Display of Advertisements

Many of the digital services we offer are supported by advertising. We may display advertisements on our digital services and on the digital services offered by our advertising partners. We place tracking technologies on your device when you interact with our digital websites and apps and this anonymous data may be used to group you into relevant audience segments so that we can deliver more relevant advertising to you. We may also use the tracking technologies to recognise your device each time we display an advertisement to your device. We are able to compile information over time about where you, or others who are using your device, saw and/or clicked on the advertisements we display. We may also associate this information with your visit, purchase or other activity on participating advertiser's digital services in order to display relevant advertisements or to determine the effectiveness of the advertisements.

For example, if we inferred that you are interested in bicycles, you may see advertisements for different brands or types of bicycles whereas if we infer that someone else is interested in travel, they might see advertisements for flights and accommodation packages. It is this targeting which enables us to optimise our advertising and your user experience and to provide you with more relevant information about different products and services available to you. Advertisers may also embed their own tracking technologies in their advertisements on our digital services. Our third party service providers may also embed tracking technologies on our digital services to assist them to perform services for us. We encourage advertisers and such third party service providers to have a privacy policy that outlines their data collection activities and usage. Please refer to such third party privacy policies for more information.

If you listen to our radio content on third party digital services, we may also infer things based on your IP address and user agent so that we can deliver more relevant advertising to you. There is no ability to opt-out of this type of advertising.

Your advertising choices

When we display interest-based advertising, we take a number of steps designed to protect your privacy. We store content consumption data (e.g. page views) used for ad targeting separately from your contact information or other data that directly identifies you. We use interest-based advertising to make the ads you see on our network more relevant to you. Online advertisements on our digital services are served by ad servers and exchanges and/or by our other third party service providers to whom we may from time to time outsource the procurement of advertising. These companies may offer you a way to opt in or opt-out of ad targeting based on their tracking technologies. If you would like to opt out of interest based advertising please click [here](#). You can also manage certain tracking technologies in your web browser privacy settings.

Opting-out means that the interest based advertising you see on our network may not be tailored to your interests or preferences on the web browser you are using. Metadata may, however, continue to be collected by us for other purposes (including those outlined above).

We follow the Australian Best Practice Guideline for Third Party Online Behavioural Advertising (**Guidelines**). The Guidelines only apply to “Third Party OBA”, which occurs when browsing behaviour off our digital services is used to deliver behavioural advertisements on our network. The Guidelines set out self-regulatory principles designed to promote transparency, consumer awareness and consumer choice in relation to the type of advertising consumers receive and to encourage good practice and accountability in businesses that deploy Third Party OBA. The Australian Digital Advertising Alliance (**ADAA**) has also developed resources for consumers explaining Third Party OBA, including answers frequently asked questions, how the technology works, and allows users to manage their online advertising preferences.

We adhere to industry “best practice” for the storage of anonymous Metadata. Security firewall, data encryption, and authorisation access are used to safeguard data held by us. For more information regarding how we treat personal information please refer to our [Privacy Policy](#).

If you have questions about this Policy or to wish to make a complaint, please contact us [HERE](#).

6. GDPR and CCPA

We do not collect Metadata or target advertisements or content to any individual whose data is subject to the European General Data Protection Regulation (**GDPR**) or the California Consumer Privacy Act (**CCPA**), other than collecting IP addresses for application monitoring and security purposes.

We may change this Tracking and Targeting Policy from time to time. Any updated versions of this Tracking and Targeting Policy will be posted on our website.

7. Location Data

We may collect information about your location when you enable location services on your mobile device, tablet or web browser linked to your user account. When location services are enabled, our apps may receive your latitude and longitude from the Apple or Android operating system (**Location Data**).

You may choose to share your Location Data once, only while the app is open, or deny access entirely. Location Data may be linked to your account and used to provide personalised recommendations and services, deliver more relevant advertising, and for analytics purposes. You can provide or withdraw consent to the collection of Location Data at any time by enabling or disabling location settings for the app in your device's operating system. Further information on managing location settings is available from: Apple devices (iPhone, iPad and Mac): [Apple support guide](#); Android devices: [Google support guide](#); and Chrome web browser: [Chrome support guide](#).

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