



Customer Data Retention, Deletion and Destruction Policy (AU and NZ)

1. Purpose

TEG is committed to protecting the privacy and security of customer data. This policy sets out how TEG Pty Ltd and its controlled subsidiaries in Australia and New Zealand (“**TEG**”) manage the retention, deletion and destruction of customer data. It applies solely to TEG entities with operations in Australia or New Zealand including Ticketek, TEG Live, TEG Dainty, TEG Van Egmond, TEG Sport, SXSW Sydney, Ovation, Life Like Touring, Handsome Tours Australia, The Entertainment Store, the Brickman Exhibitions, St Jerome’s Laneway, and Fan Plus International. This policy aims to ensure uniform compliance with applicable data protection laws and regulations across TEG, while maintaining the trust and confidence of our clients and customers.

We retain personal data only for as long as it is reasonably necessary to fulfil the purpose for which it was collected, or to meet legal, regulatory, or contractual obligations. Once data is no longer required, we take appropriate steps to securely delete or de-identify it in accordance with our internal procedures and applicable laws.

2. Scope: Who this policy applies to and covers?

Who must comply with this policy? All employees, directors, contractors and labour hire workers, apprentices, trainees and volunteers of TEG (collectively referred to throughout as **Workers**) are required to comply.

Whose data does this policy apply to? This policy **applies to the data of our customers**. A “**customer**” is any individual that interacts directly with one of our business units as a consumer of our goods or services.

Examples of customer interactions include:

- An individual creates an account with Ticketek or Ticketek Marketplace.
- An individual signs up to Ticketek Rewards or Purkle and provides personal information through surveys.
- TEG Live receives patron data from a venue in connection with an event.
- An individual subscribes to a TEG Live or Ticketek “event waitlist”.
- An individual lodges a query with customer support.

This means the policy covers data collected from customers of any ticketing, promoter, or other service offered by TEG. It applies to all data collected, processed, and stored by TEG by any channel, including data collected through websites, mobile applications, customer service interactions, at events and from third parties such as venues or co-promoters.

Different deletion, destruction and retention rules will apply depending on the type of data. This policy addresses two types of customer data: (1) customer personal information and data (**Customer PI**); and (2)



customer transaction data (**Transaction Data**). The table below details what information is considered Customer PI and Transaction Data.

Customer PI	Transaction Data
Customer PI includes any information or data about a customer, that on its own or when combined with other information could identify an individual. This includes: • Username • Customer ID • Password • First name • Last name • Email Address • Postal Address (excluding postcode) • Street Address (excluding postcode) • Date of Birth • Home Phone number • Business Phone number • Mobile Phone Number • Any “member” number fields	Transaction Data is information about the customer’s transaction which cannot be used to identify an individual. This includes: • Transaction Order ID • Event Details • Ticket Pricing • Ticket Fees • Ticket Seat Details • Ticket Barcode

Certain business units (such as Ticketek and SXSW Sydney) also collect payment information, such as credit and debit card details, when processing transactions. This information is handled in strict accordance with the Payment Card Industry Data Security Standard (PCI DSS) which outlines robust security measures for the protection of cardholder data. In addition, TEG applies its internal [Guidelines for all Computer Systems Handling Credit Card Numbers](#), which set out specific technical and procedural controls to ensure secure processing, storage, and transmission of payment information across TEG systems.

3. Retention, Deletion and Destruction Rules

General Retention Period: Customer PI will be retained for as long as necessary to fulfill the purposes for which it was collected (or for a related purpose that the individual would reasonably expect), including any legal, accounting, or reporting requirements.

At TEG the following rules apply to the retention, destruction, deletion and/or de-identification of customer PI. For clarity, we refer to “deletion” in relation to digital records and “destruction” in relation to physical records.

Rule #1 – Delete or de-identify Customer PI when upon request by the customer

Customers may request that TEG delete, destroy or de-identify their personal information (Customer PI) at any time. These requests must be actioned promptly and no later than **thirty (30) days** from the date they are received.

This requirement takes precedence over all other data retention rules, unless we are legally required to retain the information.



For clarity, **Transaction Data**, which does not identify an individual, is not required to be deleted or destroyed under this rule.

Please refer to your business unit or function's **standard operating procedures** for the process to manage data deletion requests.

Rule#2 – De-identify Customer PI when the customer's account or profile is redundant.

An account will be considered **redundant** if:

- For **Ticketek customers**, there has been no financial transaction or ticket held (including via ticket sharing) for a period of **seven (7) years**.
- For **customers of other TEG business units**, a customer has unsubscribed or been classified as an "inactive" subscriber, and **three (3) years** have passed since that date.

Where an account is deemed redundant:

- The Customer PI must be de-identified, if possible.
- Once de-identified, the data becomes De-identified Customer PI and may be retained indefinitely, subject to any applicable laws, contracts, or agreements.
- If the PI cannot be de-identified, the account, including Customer PI must be deleted or destroyed.

Rule#3 - A legal or regulatory obligation to delete or de-identify the data.

TEG may be required to delete, destroy or de-identify Customer PI due to a statutory requirement, regulatory direction, court order, or enforcement order.

Rule #4 – Transaction Data

Transaction Data can be retained indefinitely (subject to any applicable contracts, agreements or applicable laws).

4. Deletion, Destruction or De-identification of Customer PI

Deletion, destruction or de-identification of Customer PI under Rules #1-#3 must follow the process outlined below:

1. **For Ovation and Ticketek Accounts containing Customer PI:**
 - a. De-identify the account or user profile by opening the record and hashing the applicable fields identified as "Customer PI", with a non-reversible placeholder (e.g. "XXXXX"). Ensure that the redaction is irreversible and cannot be reverse engineered.
 - b. Disable the customer's account to prevent further access or use.
2. **For all other accounts containing Customer PI:**
 - a. Depending on the platform used to store the Customer PI:
 - First attempt to delete the user profile and/or account entirely.



- If deletion is not possible, de-identify the account by hashing the applicable fields identified as “Customer PI” with a non-reversible placeholder (e.g. “XXXXX”) and ensure that the redaction is irreversible and cannot be reverse engineered.
- b. Opt the customer out of all marketing communications (noting that we must not retain the customer’s email address therefore “opting out” should generally occur by default).
- c. Any physical records containing Customer PI must be disposed of confidentially and securely using the confidential document destruction bins located in each office.

5. Schedule for Deletion, Destruction or De-identification

The following schedule will be applicable:

Rule #1 - Customer Request	Deletion, destruction or de-identification will be triggered by a customer request and must be performed within 30 days of any such request. Example: Customer Joe Bloggs requests for his personal data to be de-identified on 1 March 2024. His Customer PI would need to be de-identified by 31 March 2024.
Rule #2 - Redundant Account	Ticketek and Ovation Customer PI deletion, destruction or de-identification must be performed at the end of every calendar month. All other accounts/user profiles containing Customer PI within TEG’s control must be performed at least once per quarter. Example: A Ticketek audit performed on 1 March 2024 identifies a cohort of customers with no financial transaction nor ticket possession since 1 April 2017. That Customer PI must be de-identified within thirty (30) days of that audit. If de-identification is not possible, that Customer PI must be deleted or destroyed.
Rule #3 - A legal or regulatory obligation	Deletion, destruction or retention shall occur in accordance with instructions from TEG’s Legal Team, a member of TEG’s SLT or in accordance with a “contract owner”.
Rule #4 – De-identified Transaction Data	Retain indefinitely (subject to any applicable contracts, agreements or applicable laws).

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