

## **TABTALK - COLLECTION NOTICE AND PRIVACY POLICY**

TAB Limited ABN 17 081 765 308 of 5 Bowen Crescent, Melbourne VIC 3004 (**TAB, we, us, our**) is bound by the *Privacy Act 1988* (Cth) (**Privacy Act**) and Australian Privacy Principles (**APPs**).

You can contact our Privacy Officer about privacy issues – email [privacy@tabcorp.com.au](mailto:privacy@tabcorp.com.au) or telephone +61 2 9218 1000.

### **COLLECTION NOTICE (APP 5)**

#### **1. How we collect your personal information**

Generally we collect it directly from you online at [www.tabtalk.com.au](http://www.tabtalk.com.au) (**Website**). We may also collect over the telephone. Where it isn't reasonable or practicable to collect information from you, we may collect it from a third party. For example, we may collect personal information from:

- (a) our related bodies corporate (e.g. Tabcorp Holdings Limited or Tabcorp Wagering Manager (Vic) Pty Ltd); and
- (b) third parties that can help assess your risk to our business under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) (**AML/CTF Act**).

We may use cookies to collect information from your computer. Cookies are pieces of data sent by a website to your computer and stored on the hard drive. They allow the website to identify and interact with your computer.

#### **2. What we are legally required to collect**

We may be required to collect personal information under

- (a) the AML/ CTF Act;
- (b) any licences applying to us; and
- (c) our State Race Fields Approvals.

We may also be required to collect personal information by law enforcement agencies like the Australian Federal Police, the Australian Crime Commission and the Australian Securities Investment Commission.

#### **3. Our main reasons for collecting your personal information when you join Tabtalk**

- (a) For market research and to gain a better understanding of our customers (including how we are helping you, your needs as a Tabcorp customer and your feelings about our products, services, advertisements and brand).
- (b) To develop and improve our products and services and to enable our related bodies corporate to develop and improve their products and services.
- (c) If you consent, to match your Tabtalk profile back to our customer database.
- (d) To enable our market research service providers to contact you.
- (e) To market our products and services directly to you.
- (f) To notify you if you win any promotions, giveaways or competitions.

**4. Our other reasons for collecting, holding, using and disclosing your personal information when you join Tabtalk**

- (a) To identify your preferences so we can better target our communications, competitions and prizes.
- (b) To enable our related bodies corporate to market their products and services to you.
- (b) To comply with our legal obligations, including under the AML/CTF Act and any licences or approvals applying to us.

**5. What happens if we don't collect your personal information?**

Unfortunately, if we cannot collect your personal information you may not be able to participate in Tabtalk market research community. For example, if you don't complete the initial profiling survey you won't be able to join the Tabtalk community.

**6. Disclosures to third parties**

Generally we only give your personal information to:

- (a) other organisations undertaking market research on our behalf;
- (b) external providers of services we use to operate our business and manage our business systems (e.g. advertising agencies, mailing houses, printers, call centres, IT consultants, and providers of product development, and identity verification services);
- (c) Tabcorp Holdings Limited, Tabcorp Wagering (Vic) Pty Ltd, Luxbet Pty Ltd and our other related bodies corporate;
- (d) regulatory authorities and bodies that control or coordinate a racing code or sport, or are responsible for the integrity of a racing code or sport;
- (e) government agencies responsible for enforcing the AML/CTF Act; and
- (f) our employees and contractors, but only as needed to perform their jobs (they have obligations to treat the personal information they access as confidential).

**7. Access and correction**

The Privacy Policy tells you how you may access the personal information we hold about you and request its correction - see section V.

**8. Complaints**

The Privacy Policy tells you how you may complain about a breach by us of the APPs or any APP code applying to us, and explains how we will deal with your complaint - see section VI.

**9. Disclosing personal information overseas**

Personal information we collected from the Tabtalk community is disclosed to Vision Critical of British Columbia, Canada, the company that hosts the Website and manages the Tabtalk database (see section VII. of the Privacy Policy for more information). We do not disclose the information to any other recipients located outside Australia.

## PRIVACY POLICY

TAB is committed to implementing practices, procedures and systems that:

- ensure we comply with the APPs (and any APP code applying to us); and
- allow us to deal with your enquiries and complaints regarding compliance with the APPs (or any APP code applying to us).

### I. ABOUT THIS POLICY

Under the Privacy Act, 'personal information' is generally any information or opinions that identify you personally.

This Privacy Policy explains how we manage your personal information, including:

- (a) the kinds of personal information we collect and hold;
- (b) how we collect and hold your personal information;
- (c) our reasons for collecting, holding, using and disclosing personal information;
- (d) how you may access your personal information held by us and have it corrected;
- (e) how you may complain about the way we deal with your personal information, and how we will deal with you complain; and
- (f) whether we will disclose your personal information to overseas recipients, and if so the likely location(s) of those recipients.

By using the Website you accept this Privacy Policy. We may change this Privacy Policy as required at any time. If we do, we'll post the updated version on the Website with the date of the changes.

### II. KINDS OF INFORMATION WE COLLECT AND HOLD

#### 1. Joining Tabtalk

To become part of the Tabtalk community you need to complete the initial profiling survey, which will ask for personal information including your name, residential address, email and date of birth. If you qualify to become a Tabtalk member, we will collect and store the personal information you voluntarily provide to us each time you complete a survey. We will also record the date on which each survey is completed. We may also collect your TAB account number.

If you do not qualify to become a Tabtalk member, all personal information provided by you in the initial profiling survey will be destroyed or de-identified.

#### 2. AML/ CTF Act

Under the AML/ CTF Act we may have to:

- request further personal information from you; and
- retain the content of any email you send us.

#### 3. Tracking online behaviour

We may collect:

- your responses to promotions, giveaways and competitions;

- the time, date and URL of each request for a page from our web server, plus information on the browser software being used to make the request; and
- information from your computer or device allowing us to: analyse trends, administer the Website, track your web navigation, and gather broad demographic information for aggregated use.

To do this we may use cookies (pieces of data sent by a website to your computer and stored on the hard drive). Cookies allow the website to identify and interact with your computer. We do not use cookies to retrieve information that was not originally sent by us to you in a cookie.

You can set your browser to accept or reject all cookies, or notify you when a cookie is sent. If you reject cookies or delete our cookies, you may still use the Website, but may not have access to “account holder only” areas of it.

### III. HOW WE COLLECT AND HOLD PERSONAL INFORMATION

Section 1 [http://tab.custhelp.com/app/answers/detail/a\\_id/128](http://tab.custhelp.com/app/answers/detail/a_id/128) of the Collection Notice tells you how we collect Personal Information.

TAB takes reasonable precautions to protect the personal information it holds from:

- (a) misuse, interference and loss; and
- (b) unauthorised access, modification or disclosure

These include: protection of passwords using industry standard encryption, measures to preserve system security and prevent unauthorised access, and back-up systems to prevent accidental or malicious loss of data. Any paper copies are stored in locked cabinets or restricted access archive rooms.

We may use third party providers to store personal information electronically. We take reasonable steps to ensure this information is held as securely as information stored on our own equipment.

We use cookies to protect and ensure the security of information that you give to us on the Website. Unfortunately we cannot remove all risks involved in sending information through any channel over the Internet. You send information over the Internet entirely at your own risk.

### IV. HOW WE USE AND DISCLOSE PERSONAL INFORMATION

Sections 3 and 4 [http://tab.custhelp.com/app/answers/detail/a\\_id/128](http://tab.custhelp.com/app/answers/detail/a_id/128) of the Collection Notice tell you the purposes for which we collect, hold, use and disclose personal information from the Tabtalk community.

We use the information about you in the Tabtalk customer database to identify appropriate surveys for you to complete, and may add your survey responses to an aggregated data pool for analysis, but only to help us identify trends in customer groups. The information is not used in a way that allows your individual responses to be identified. Below is some information about other specific uses and disclosures.

#### 1. Service providers

We disclose personal information to external service providers that assist us to:

- (a) conduct market research;
- (b) electronically verify your identity (including online);
- (c) provide, manage and administer our products and services (including mailing houses, printers, advertising agencies, postal services, call centres and IT consultants);
- (d) develop and market our products and services; and
- (e) assess risks under the AML / CTF Act.

## **2. Regulators/ industry bodies**

We may disclose your personal information:

- (a) at the request of a government authority or law enforcement agency;
- (b) to the State racing controlling bodies (including thoroughbred, harness and greyhound) under our State Race Fields Approvals and our contracts with those bodies; and
- (c) to authorised sports controlling bodies (domestic and international).

## **3. Related corporations**

We may disclose personal information to our related bodies corporate, including:

- Tabcorp Holdings Limited;
- Tabcorp Wagering Manager (Vic) Pty Ltd;
- Luxbet Pty Ltd; and
- other related bodies corporate as required,

so they can:

- (a) comply with the laws, regulations and licence conditions applying to them; and
- (b) send you marketing information directly.

## **4. Marketing**

We may use and disclose your personal information to third parties. If you consent, we will use and disclose the personal information you provide through Tabtalk to:

- (a) let you know about upcoming TAB events, promotions, and new products and services or other opportunities via direct mail, email, SMS, or MMS;
- (b) if you are a TAB account holder, identify your betting behaviour, habits and preferences;
- (c) if you are a member of TAB Rewards:
  - inform you of marketing and promotional offers; and
  - notify you of points earned (including free, bonus and promotional points),
 via direct mail, email, SMS, MMS or phone calls from us and/or our TAB Rewards partners.
- (d) send you product and service information on behalf of third parties; and
- (e) enable our related bodies corporate and selected third party partners to send you product and service information directly.

Each time you are sent a marketing communication, you will be able to opt-out from future marketing communications. You can also opt-out from future marketing communications at any time (email: [privacy@tabcorp.com.au](mailto:privacy@tabcorp.com.au)). We will promptly action any opt-out request.

## **V. HOW CAN I ACCESS AND CORRECT MY PERSONAL INFORMATION?**

We will take reasonable steps to ensure the personal information we hold about you is accurate, up-to-date and complete. Please let us know if there's a change to any of the details you have provided to us.

### **1. Access**

You have a right to ask for access to the personal information we hold about you. Please contact the Privacy Officer at:

Tabcorp, GPO Box 4168, Sydney NSW 2001

Telephone: +61 2 9218 1000; e-mail: [privacy@tabcorp.com.au](mailto:privacy@tabcorp.com.au)

Your personal information will usually be available within 30 days of your request. If there is a fee for accessing your personal information, we will confirm the amount before providing the information.

We may not give access to your personal information if the APPs do not require us to (e.g. because it would have an unreasonable impact on the privacy of others).

### **2. Corrections**

You have a right to ask us to correct the personal information we hold about you. Please contact the Privacy Officer at:

Tabcorp, GPO Box 4168, Sydney NSW 2001

Telephone: +61 2 9218 1000; e-mail: [privacy@tabcorp.com.au](mailto:privacy@tabcorp.com.au)

It is not always possible to remove or modify information in our databases, but we will take reasonable steps to correct your personal information so it is accurate, up-to-date, complete, relevant and not misleading.

If we decline to correct your personal information, you may request us to attach a statement that it is inaccurate, out-of-date, incomplete, irrelevant or misleading. If we disclosed the information to a third party before correcting it, you may request us to notify the third party of the correction we've made.

We will not charge you for a correction request, for making a correction or for attaching a statement.

## **VI. MAKING COMPLAINTS**

If you have a concern about how we have handled your personal information, please let us know so we can fix the problem. You can contact us at:

Privacy Officer

Tabcorp, GPO Box 4168, Sydney NSW 2001

Telephone: +61 2 9218 1000; e-mail: [privacy@tabcorp.com.au](mailto:privacy@tabcorp.com.au)

To lodge a formal complaint, please send details to the Privacy Officer in writing. We will respond within a reasonable time - usually 30 days.

If your complaint is not resolved by the Privacy Officer and concerns credit-related personal information, you may be able take it to an external dispute resolution scheme. The Privacy Officer will give you details of the relevant scheme.

If your complaint is not resolved by our Privacy Officer or an external dispute resolution scheme, you can refer it to the Office of the Australian Information Commissioner. The contact details are:

Office of the Australian Information Commissioner  
 GPO Box 2999  
 Canberra ACT 2601, Australia  
 Phone: 1300 363 992  
 Fax: 02 9284 9666  
[www.oaic.gov.au](http://www.oaic.gov.au)

## **VII. DISCLOSURE OF PERSONAL INFORMATION OVERSEAS**

The personal information we collect from the Tabtalk community is disclosed to Vision Critical of 200 Granville Street, Vancouver, British Columbia, V6C 1S4, Canada. This business hosts the Website and manages the Tabtalk database. They have agreed not to use the information for any purpose other than analysing and reporting survey results, and not to disclose it to anyone other than TAB and its related bodies corporate. We do not disclose the information to any other recipients located outside Australia.

Further, we will only disclose personal information to an overseas recipient if:

- (a) we've taken reasonable steps to ensure that recipient does not breach the APPs (other than APP 1); or
- (b) we reasonably believe that:
  - a law or scheme in the country of the recipient includes requirements that are substantially similar to the requirements of the APPs; and
  - you can take action to enforce that law or scheme; or
- (c) we have informed you of the disclosure and we have your express consent; or
- (d) the APPs otherwise allow it.

## **VIII. SENSITIVE INFORMATION**

We won't collect sensitive information, such as your:

- racial or ethnic origins;
- political opinions;
- religious or philosophical beliefs;
- sexual preferences or practices;
- criminal records; or
- health information;

unless:

- (a) you consent; or
- (b) it is required or authorised by law (e.g. to maintain the security or integrity of our venues or to comply with the AML/CTF Act).

The AML/CTF Act may require us to collect sensitive information (for example, to verify your identity), and we may collect this from third parties. The information will be stored securely in an AML/CTF Risk Register, and you will not have access to it. You will not be informed that we have collected the sensitive information.

#### **IX. HOW LONG CAN TABCORP KEEP MY PERSONAL INFORMATION?**

If Tabcorp:

- no longer needs to use or disclose your personal information for any purpose that is authorised under the APPs; and
- is not legally required to retain that information,

then it will take reasonable steps to destroy or de-identify the personal information.

If you are not accepted as a Tabtalk member, we destroy or de-identify the personal information you provided in the initial profiling survey. If Vision Critical stops providing services for Tabtalk then Vision Critical will be obliged to return to TAB all information it holds about Tabtalk members, and will no longer have the right to use or hold that information.

Last updated: 12 March 2014