

# **TABCORP GROUP PRIVACY POLICY**

## **1 ABOUT THIS PRIVACY POLICY**

### **1.1 Companies covered by this Privacy Policy**

This Privacy Policy applies to Tabcorp Holdings Limited (ABN 66 063 780 709) and its subsidiaries that are incorporated in Australia or are otherwise subject to the *Privacy Act 1988* (Cth) (**Privacy Act**). We refer to these entities as **Tabcorp, we, us** or **our** and the **Tabcorp Group**.

Tabcorp is bound by and complies with the Privacy Act, the Australian Privacy Principles (**APPs**) and (where relevant) the *Privacy (Credit Reporting) Code 2014* (**Privacy (Credit Reporting) Code**).

You can access this Privacy Policy via our websites. Alternatively, you can request that we provide you with a copy of this Privacy Policy in another format (such as a hard copy) by email to [privacy@tabcorp.com.au](mailto:privacy@tabcorp.com.au) or telephone to +61 3 9868 2100.

### **1.2 Tabcorp's commitment to privacy compliance**

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

- ensure we comply with the APPs (and any APP code applying to us) and the Privacy (Credit Reporting) Code; and
- allow us to deal with your enquiries and complaints concerning compliance with the APPs, any APP code applying to us or the Privacy (Credit Reporting) Code.

You can contact our Privacy Officer to discuss any privacy related queries you may have - email [privacy@tabcorp.com.au](mailto:privacy@tabcorp.com.au) or telephone +61 3 9868 2100.

### **1.3 This Privacy Policy applies to personal information**

This Privacy Policy applies to personal information. Under the Privacy Act, "personal information" is information or an opinion about an identified individual or an individual who is reasonably identifiable. Common examples include a customer's or job applicant's name, address, telephone number or date of birth.

### **1.4 This Privacy Policy applies to credit information and credit eligibility information**

This Privacy Policy also applies to credit information and credit eligibility information, which are specific forms of personal information. General explanations of what is meant by terms including "credit information" and "credit eligibility information" are provided in section 12. Tabcorp does not have a separate policy about the management of credit information and credit eligibility information.

### **1.5 Overview of this Privacy Policy**

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 personal information;
- (c) why we collect and hold personal information;
- (d) how we use and disclose personal information;
- (e) the security measures we use to protect personal information;

- (f) how you may access your personal information held by us and have it corrected;
- (g) how you may complain about the way we deal with your personal information, and how we will deal with your complaint; and
- (h) whether we are likely to disclose your personal information to overseas recipients, and if so the likely location(s) of those recipients.

## 1.6 Your agreement to this Privacy Policy

By using any Tabcorp website (including our iPhone Apps, iPad Apps or Android Apps or via phone) or agreeing to the terms and conditions for any Tabcorp wagering (including Luxbet) or keno account(s) or for your Tabcorp Training account(s), you confirm that you have read and agree to this Privacy Policy. Please read this policy carefully to understand our practices regarding your personal information and how we will treat it.

We will review this Privacy Policy periodically, and reserve the right to modify and update it at any time. You acknowledge that we may make changes to this Privacy Policy. Changes to this Privacy Policy will come into effect immediately upon such changes being uploaded on our websites (or our iPhone Apps, iPad Apps or Android Apps). Your continued use of our products and services following such upload will constitute your acceptance of these changes.

## 1.7 Employee records exception

Where applicable, Tabcorp will rely on the "employee records exemption" in the Privacy Act and any other applicable exemptions in the Privacy Act or other relevant legislation. The employee records exemption means that in many cases, Tabcorp is not bound by the requirements of the Privacy Act in relation to personal information it holds about its current or former employees (relating to their employment).

## 2 KINDS OF INFORMATION WE COLLECT AND HOLD

This depends on your dealings with us, and the requirements of the laws, regulations, licence conditions and betting rules applying to us, e.g. under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) (**AML/CTF Act**). We note that this list is not exhaustive.

### 2.1 Opening accounts

To open and operate a Tabcorp account (whether this is a Keno, TAB or Luxbet account), we need your:

- name;
- residential and email addresses;
- date of birth; and
- telephone number.

We may also ask for copies of documents confirming your identity, such as your:

- driver's licence;
- passport;
- birth certificate; and/or
- utility bills.

We may ask for other details from you, such as:

- your gender;
- your credit card or bank account details, which may include a photocopy or scanned image of the front and back of your credit card (in order to allow you withdraw or deposit funds into your account); and
- some lifestyle or betting frequency information.

If you apply to become a Platinum or Premium customer or apply to receive access to TAB Studio, in addition to information provided to open a wagering account you will need to supply your wagering account number(s) (if applicable) and other details as may be reasonably required by us.

If you open an account with us, or access or use your existing account, using your mobile device (e.g. a smart phone) whilst in one of our retail agencies or venues, you consent to Tabcorp collecting your personal information (including the fact that you are in that agency or venue at the time of opening your account or accessing or using your account) via your mobile device (**Mobile Device Information**). Tabcorp may disclose your Mobile Device Information to that retail agency/venue for analytical purposes and direct marketing, as described in section 5.5.

## **2.2 Claiming prizes and website enquiries**

If you win a prize, or apply for an unclaimed prize or dispute a decision we make, we will collect your personal information including your name, residential address and contact phone number.

If you send us an enquiry through one of our websites, we may collect your name, phone number and email address.

## **2.3 Working for Tabcorp**

If you wish to be employed or engaged by Tabcorp (directly or indirectly, e.g. as an employee of a labour supply company), we will need personal information about you which may include:

- name;
- residential and email addresses;
- telephone number;
- academic results and qualifications;
- expertise and experience;
- employment history;
- personal interests;
- current salary and salary expectations; and
- background information about you including for example your criminal record and whether you are a politically exposed person or sanctioned person.

Tabcorp may for example search government records and publicly available sources, including social media and other internet sources, for background information about you. Tabcorp requires background information as part of its assurance program on the identity, honesty and integrity of both prospective and current employees. Background checks may require Tabcorp to disclose information about you to certain regulators and other third parties.

## **2.4 Supplying goods or services to Tabcorp**

If you are a supplier of goods or services to Tabcorp, or are employed or engaged by such a supplier, we may collect personal information about you including:

- name;
- position;
- business and email addresses; and
- telephone number.

## **2.5 Shareholders and staff of financial services institutions**

To become a Tabcorp shareholder you may need to provide your:

- name; and
- residential and email addresses.

We will also require copies of identification documents, such as:

- driver's licence;
- passport;
- birth certificate; and/or
- utility bills.

Once you have invested, we may collect:

- your bank account details;
- your security holder identification number;
- your instructions for delivery of shareholder communications;
- copies of any power of attorney you grant (or details of that power of attorney);
- your Tax File Number or ABN exemption; and
- copies of shareholder correspondence sent and received.

We also collect names and contact details of managers and key personnel at institutions (e.g. banks) which offer customers investment products incorporating Tabcorp shares.

## **2.6 Participating in Tabcorp Training programs**

If you register or enrol to participate in a Tabcorp Training program, we will collect personal information including your:

- name;
- residential and email addresses;
- date of birth; and
- telephone number.

We may ask for copies of documents confirming your identity, such as your:

- driver's licence;
- passport;
- birth certificate; and/or

- wagering account number with us, if you have one.

We may also ask for other details from you, such as:

- your gender;
- information about qualifications and other training you are undertaking or have completed;
- sensitive information including citizenship, Aboriginal or Torres Strait Islander origin and any disability you may have (for the purpose of required reporting to relevant Commonwealth, State and Territory government authorities and agencies); and/or
- your credit card details (if you need to pay directly for programs).

## 2.7 Information from other Tabcorp companies

Other companies in the Tabcorp Group (our **related bodies corporate**) may provide us with information about you such as:

- your name;
- your contact details;
- your date of birth;
- copies of identification documents;
- lifestyle or betting frequency information; and
- recordings of telephone calls you have made to our call centres.

## 2.8 AML/CTF Act and video surveillance

Under the AML/CTF Act we may have to:

- request further personal information from you (e.g. confirmation of your account transactions, your occupation and/or your employer); or
- collect information about your transactions on any accounts, including any email you send to us, and report activity externally.

For security reasons we may collect footage from video surveillance at our retail agencies and venues including those owned and operated by third parties under licence.

## 2.9 Online behaviour

We may collect information regarding your online behaviour, including:

- your responses to correspondence, promotions, giveaways and competitions;
- the time, date and URL of each request for a page from our web server and other web servers assisting us (including the times that you log in to any account to ensure the security of your account and to verify that the person operating the account is you), 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 our websites, 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 our websites, but may not have access to “account holder only” or other restricted areas.

## **2.10 Credit information and credit eligibility information**

In some instances, we may provide credit to customers. We may collect and hold credit information and credit eligibility information about those customers.

## **3 HOW WE COLLECT PERSONAL INFORMATION**

We generally collect your personal information directly from you via one of our websites or Apps or via telephone, by mail or in person. However, we may collect information from a third party if it isn't reasonable or practicable to collect it from you or if necessary to satisfy our legal obligations.

For example, we may collect your personal information from:

- (a) third parties that can help assess your risk to our business under the AML/CTF Act;
- (b) a referee nominated by you when you apply for a job with us;
- (c) your employer if you are employed by a company that provides goods or services to us;
- (d) our related bodies corporate;
- (e) our share registry provider;
- (f) institutional investors (e.g. banks) that offer customers investment products incorporating Tabcorp shares;
- (g) government agencies in connection with court proceedings;
- (h) our retail agencies and venues;
- (i) any entity that provides training consultancy services to us;
- (j) credit reporting bodies if you have or apply for a credit betting facility with us;
- (k) public sources (e.g. social media sites, Google and other websites), e.g. for the purposes of our AML/CTF Act compliance program;
- (l) to the extent relevant, any State regulatory bodies to confirm whether you are a voluntarily self-excluded patron in Australia or any other country; and
- (m) any other relevant Commonwealth, State or Territory government authority or agency.

We may derive credit information from your dealings with us in relation to credit, e.g. when you make payments to us.

We may combine credit reporting information from a credit reporting body with our own information relevant to your credit worthiness, to derive further information about your credit worthiness which we may use to determine whether to offer credit to you.

Betting rules relevant to Tabcorp's wagering entities require us to record bets made over the telephone. Luxbet's NT licence also requires us to record all telephone conversations customers make to Luxbet (including all bets, queries and disputes).

All phone calls to Operator Assist, Touchtone, Speech Express and Tabcorp Customer Service are recorded for regulatory, verification and quality purposes.

## 4 WHY WE COLLECT AND HOLD PERSONAL INFORMATION

### 4.1 Reasons for collecting and holding your personal information

Our reasons for collecting and holding your personal information include:

- (a) to identify you;
- (b) to manage, administer, and control the quality of, the products and services we provide to you;
- (c) to market our products and services to you;
- (d) to market the products and services of our related bodies corporate, and to enable our related bodies corporate and selected third party partners to market products and services to you;
- (e) if we offer you a credit facility, to:
  - obtain information allowing us to assess your credit application;
  - assist with the management of complaints and legal proceedings;
  - enable the management and recovery of debts; and
  - participate in the credit reporting system, including to provide credit information to credit reporting bodies and assist other credit providers in accordance with the Privacy Act;
- (f) to operate self-exclusion, pre-commitment limit and bet exemption programs;
- (g) to administer and manage the ownership of Tabcorp shares (including entitlements to dividends, voting and title);
- (h) to identify underlying beneficial owners of shares held by institutions (e.g. banks);
- (i) to consider you for employment, if you apply for a position with us;
- (j) to do business with our suppliers of goods and services (you may be a supplier, or employed or engaged by a supplier);
- (k) to notify you if you have won a competition, promotion or prize;
- (l) to carry out research and analysis related to our products and services;
- (m) to develop and improve our products and services;
- (n) to ensure the security of any account you may hold with Tabcorp;
- (o) to maintain security at the venues we own and operate, and at the retail agencies and venues owned and operated by third parties under licence;
- (p) to assist retail agencies and venues with the management of those agencies and venues;
- (q) to identify your behaviour, habits and preferences;
- (r) to assist you with enquiries or complaints;
- (s) to assess whether you pose a risk to our business or the businesses of our related bodies corporate;
- (t) to protect our rights and property and those of any Tabcorp customer;
- (u) to maintain a register of individuals who have undertaken specific training programs provided by us; and
- (v) any other purpose required or permitted by law.

Another reason for collecting and holding your personal information is to comply with our legal obligations. For example, we may be legally required to collect personal information under:

- the AML/CTF Act (and we may collect your personal information for the purpose of implementing our AML/CTF Act compliance program);
- the *Corporations Act 2001* (Cth) (**Corporations Act**);
- the ASX Listing Rules and Settlement Operating Rules (**ASX Rules**);
- the *National Vocational Education and Training Regulator Act 2011* (Cth) and relevant State and Territory vocational education and training legislation;
- the conditions of licences applying to us;
- legislation and contractual obligations with the State controlling bodies (including thoroughbred, harness and greyhound) relevant to our State Race Fields Approvals; and
- legislation and contractual obligations with the authorised sports controlling bodies (domestic and international).

We may also be required to collect personal information for the purpose of investigations by law enforcement agencies like the Australian Federal Police, the Australian Competition and Consumer Commission, the Australian Securities and Investments Commission and the Australian Crime Commission.

#### **4.2 What happens if we don't collect your personal information?**

Unfortunately, if we are unable to collect your personal information we may not be able to provide our products and services to you and/or any account that you may hold may not perform properly. We may also be unable to issue or administer any Tabcorp shares you have applied for.

For example:

- if you do not provide the necessary identification documents when required, your account may be frozen and you will not be able to place bets or access your funds until we have verified your identity;
- if you refuse or are unable to provide further information we are required to collect under the AML/CTF Act, we may freeze your account until you provide the additional information;
- if you do not provide sufficient information about your identity, qualifications and experience we may not be able to consider you for employment with us; and
- if you hold Tabcorp shares and do not provide relevant personal information:
  - we may not be able to pay you dividends;
  - we may not be able to send you important shareholder communications like proxy forms or annual reports; and
  - you may not be able to vote on resolutions at our Annual General Meetings.

## **5 HOW WE USE AND DISCLOSE PERSONAL INFORMATION**

Information about how we use and disclose personal information is below.



This list is not intended to be exhaustive and there may be other third parties to which we give your personal information (for example, professional advisors or insurers) where required or permitted by law.

### **5.1 Our employees and contractors**

We may disclose personal information to our employees and contractors, but only as needed to perform their jobs (they have obligations to treat the personal information they access as confidential).

### **5.2 Public relations**

If you win a major prize we may give your details to external publicity businesses for reasonable promotional activities. By entering into a promotion with one of our companies, you will be consenting to this use of your personal information.

### **5.3 Service providers**

We may disclose personal information to the organisations that assist us to:

- (a) provide identification information match results in relation to verification documents that you may provide to us;
- (b) electronically verify your identity (including online) or check your name against government or other watch lists (e.g. if you are the subject of economic sanctions imposed by the Government);
- (c) provide, manage and administer our products and services, our business and our business systems (including mailing houses, our share registry provider, printers, public relations and advertising agencies, postal services, call centres, product development consultants, providers of customer relationship management (CRM) and affiliate management services, providers of fraud detection services, IT technicians and software providers, IT consultants, website developers, providers of services to support our training programs, providers of payment processing and identity verification services (including D&B greenID verified with the issuer or the official record holder), data centre providers and providers of technology platforms like TAB Active);
- (d) develop and market our products and services (including market research analysts);
- (e) assess risks under the AML/CTF Act;
- (f) manage Tabcorp loyalty programs (including updating points balances, identifying any free, bonus or promotional points owing to members, and sending members information);
- (g) comply with Payment Card Industry Standards, and securely manage processing of your credit card payments and storage of your credit card details; and
- (h) analyse trends and aggregated demographic information, and target your interests.

### **5.4 Regulators/industry bodies**

We may disclose your personal information to:

- (a) regulators and law enforcement agencies (including those responsible for enforcing the AML/CTF Act);

- (b) respond to an enquiry from a government agency under State, Territory or Commonwealth laws (e.g. about child support);
- (c) state racing controlling bodies (including thoroughbred, harness and greyhound) under our State Race Fields Approvals and our contracts with those bodies;
- (d) authorised sports controlling bodies (domestic and international);
- (e) other organisations that coordinate a sport or racing code or are responsible for the integrity or regulation of a sport or racing code; and
- (f) any other relevant Commonwealth, State and Territory government authorities and agencies.

## **5.5 Our retail agencies and venues**

We may disclose your personal information to our retail agencies and venues (including their owners, managers, operators and staff) for purposes including allowing them to:

- be informed that you have excluded yourself from a particular retail agency or venue;
- review and improve their products and services;
- help them identify new products and services;
- perform statistical analysis;
- keep informed about training you have enrolled for or undertaken with us;
- help us to comply with our AML/CTF Act compliance program; and
- help them to comply with their legal obligations,

and to otherwise help us to manage our relationships with our retail agencies and venues.

Tabcorp may also disclose your Mobile Device Information to the owner/manager/operator/staff of the retail agency/venue where you are when you open your account with us or where you are when you access or use your existing account, for use in direct marketing to you (including via electronic messaging such as email or SMS).

Our retail agencies and venues may have their own privacy policies which explain how the agency/venue will collect, store, use and disclose your personal information.

## **5.6 Related corporations**

We may disclose personal information to our related bodies corporate:

- (a) so they can comply with their obligations under laws, regulations, licence conditions and betting rules;
- (b) so they can send you marketing information directly (see section 5.9); and
- (c) as otherwise required or permitted by law.

## **5.7 Loyalty partners**

If you join a Tabcorp loyalty program, we may disclose your personal information to business partners outside the Tabcorp group (e.g. racing clubs and sports controlling bodies across Australia) and from time to time other third parties, so they can send you promotional offers and information about their products and services.

## 5.8 Credit reporting bodies

If you have or apply for a credit betting facility with us, we may disclose personal information about you to credit reporting bodies:

- (a) for the purposes of assessing your credit application;
- (b) which may include the fact that we provide you with consumer credit and the day on which the credit arrangement is entered; and
- (c) which may be included in reports that a credit reporting body provides to other credit providers to assist them in assessing your credit worthiness.

If you fail to meet your payment obligations or commit a serious credit infringement, we may also be entitled to disclose this information to credit reporting bodies in accordance with the Privacy Act.

The credit reporting bodies to which we may disclose your personal information include:

Veda Advantage Information Services and Solutions Limited (ABN: 26 000 602 862)  
**(Veda)**  
 PO Box 964, North Sydney, New South Wales, 2059  
[www.veda.com.au](http://www.veda.com.au)

If you would like to read Veda's policy regarding the management of credit-related personal information, visit Veda's website at [www.veda.com.au](http://www.veda.com.au) and click on the "Privacy Policy" links, or contact Veda directly for more information.

You have the right to request that Veda does not use your credit reporting information for the purposes of pre-screening of direct marketing. You also have the right to request that Veda does not use or disclose your credit reporting information if you believe on reasonable grounds that you have been, or are likely to be, the victim of fraud (i.e. if you suspect someone may use your identity to apply for credit). You must contact Veda directly if this is the case.

## 5.9 Marketing

We may use and disclose your personal information for marketing purposes, including to:

- (a) identify your betting and other behaviours, habits and preferences;
- (b) let you know about upcoming events, training programs, promotions and new products/services or other opportunities, via direct mail, email, SMS, MMS and/or phone calls (or any other means of marketing communication);
- (c) if you are a member of a loyalty program:
  - 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, phone calls or other means of communication from us and/or our loyalty 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.

By agreeing to the terms and conditions for your Tabcorp account(s) or for your Tabcorp Training account(s), you consent to all of the above. Your consent will last indefinitely (including after your Tabcorp account(s) are closed) but 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.

You also consent to receiving marketing material from our third party partners, which consent will also last indefinitely (including after your Tabcorp account(s) are closed) but you may withdraw that consent at any time – to withdraw your consent, follow the instructions in the advertising material or on the third party’s website or email: [privacy@tabcorp.com.au](mailto:privacy@tabcorp.com.au).

### 5.10 Replacement providers

If we:

- (a) transfer responsibility for providing a Tabcorp product or service to another business; or
- (b) stop providing a Tabcorp product or service (or limit it), and another business continues to offer a similar product/service,

we may disclose personal information to the other business so the product or service can continue to be provided to you. By agreeing to the terms and conditions for your Tabcorp account(s) or for your Tabcorp Training account(s), you consent to this disclosure, but you may withdraw that consent at any time - email: [privacy@tabcorp.com.au](mailto:privacy@tabcorp.com.au).

### 5.11 Monitoring of betting accounts, including emails

Under the AML/CTF Act we may monitor transactions on your account(s), including emails you send to us.

We may use and disclose information collated during monitoring, including by releasing your personal information to government authorities, to sporting bodies, to bookmakers and to other betting and gambling operators. We will not tell you when we monitor your transactions or if we disclose any personal information obtained.

### 5.12 Monitoring phone calls

We record various types of telephone calls – see section 3 above.

We may disclose the details of your calls with us to enforcement agencies, regulators and external advisors. We will not notify you of those disclosures.

If you would like to request a copy of your recorded telephone calls, please send a written request (including your email address) to:

Privacy Officer  
5 Bowen Crescent, Melbourne VIC 3000

or: [privacy@tabcorp.com.au](mailto:privacy@tabcorp.com.au)

We will use our reasonable endeavours to respond to your request within 30 days.

## 6 SECURITY OF PERSONAL INFORMATION

Tabcorp 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, for example, the protection of passwords using industry standard encryption; measures to preserve system security and restrict unauthorised access; and back-up systems to reduce the risk of accidental or malicious loss of data. We may use third party

providers to store personal information electronically. We take reasonable steps to ensure this information is held securely.

Documents verifying your identity and any credit card information you send us will be stored in a secure database with limited access requiring a password or other unique identifier.

Unfortunately there is always risk involved in sending information through any channel over the Internet. You send information over the Internet entirely at your own risk.

## **7 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 given to us.

### **7.1 Access**

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

5 Bowen Crescent, Melbourne VIC 3000

Telephone: +61 3 9868 2100 or email: [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.

In some circumstances we may decline to grant you access to your personal information (for example, if the release of your personal information would have an unreasonable impact on the privacy of others). Please see the APPs for further information.

If we refuse access to your credit information or credit eligibility information in accordance with an exception in the Privacy Act, we will (where reasonable) provide you with a written notice specifying the reasons for such refusal and your rights to raise the matter with an external dispute resolution scheme or the Office of the Australian Information Commissioner.

We may require evidence of your identity as part of the process of providing you with access to your personal information.

If you request access to credit information or credit eligibility information about you that is no longer in our possession, we will advise you of the credit reporting body from which you may obtain a copy.

### **7.2 Corrections**

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

Privacy Officer

5 Bowen Crescent, Melbourne VIC 3000

Telephone: +61 3 9868 2100 or email: [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 to ensure that it is accurate, up-to-date, complete, relevant and not misleading.

If we decline to make your requested correction, you may request us to attach to your personal information a statement that it is inaccurate, out-of-date, incomplete, irrelevant or misleading. We will take reasonable steps to do this.

If we disclosed your personal 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 take reasonable steps to do so unless this would be impractical or unlawful.

We will not charge you to request a correction, for making a correction or for associating a statement with a record.

## **8 MAKING COMPLAINTS**

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

Privacy Officer

5 Bowen Crescent, Melbourne VIC 3000

or telephone: +61 3 9868 2100, fax: +61 3 9868 2300 or email: [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 attempt to respond within a reasonable time, usually 30 days. Tabcorp treats all privacy complaints seriously and any complaint will be assessed by our Privacy Officer with the aim of resolving any issue in a timely and efficient manner. We request that you cooperate with us during this process and provide us with any relevant information that we may need to investigate the complaint appropriately.

If your complaint is not resolved by our 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

Website: [www.oaic.gov.au](http://www.oaic.gov.au)

## **9 DISCLOSURE OF PERSONAL INFORMATION OVERSEAS**

We may disclose your personal information to recipients located outside Australia that provide services to us (for example, we may disclose your personal information to third parties in the United States of America, United Kingdom, Japan, Ireland and India) who provide customer relationship management services, identification and fraud detection services, cloud and data storage services, IT support services and other third party services to us.

However, we 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);
- (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;
- (c) we have informed you of the disclosure and we have your express consent; or
- (d) the APPs otherwise allow it.

We do not currently disclose credit information or credit eligibility information (other than identification information) to overseas recipients.

## 10 SENSITIVE INFORMATION

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

- (a) racial or ethnic origins;
- (b) political opinions;
- (c) religious or philosophical beliefs;
- (d) sexual orientation or practices;
- (e) criminal record; or
- (f) health information;

unless:

- you consent;
- it is required or authorised by law;
- it is needed in relation to you working with (or applying to work with) Tabcorp, e.g. health information relating to a disability that needs to be accommodated in the workplace;
- it is needed to manage your self-exclusion or voluntary pre-commitment limit, or to remove you from a self-exclusion program (which generally requires a copy of a report from a registered gambling counsellor or voluntary pre-commitment election);
- it is needed to provide certain training programs or services effectively to you; or
- it is needed to enact special features on your Tabcorp account(s) (e.g. Minimum Bet Exemptions).

We note that 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.

If we consider that you pose a high risk to our business, we may disclose sensitive information about you to government authorities and may use the sensitive information as grounds to stop providing our services to you. We may freeze your account without warning and without telling you we are relying on sensitive information to do so.

## 11 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 the personal information or ensure it is de-identified.

## 12 MEANING OF "CREDIT INFORMATION", "CREDIT ELIGIBILITY INFORMATION" AND OTHER TERMS

General explanations of what is meant by terms including "credit information" and "credit eligibility information" are below. Detailed definitions of these terms can be found in the Privacy Act. You can access the Privacy Act via the [Office of the Australian Information Commissioner's website](#).

**Credit information** includes:

<b>Identification information</b>	E.g. your name, address, date of birth and current employer.
<b>Consumer credit liability information</b>	E.g. details of consumer credit accounts that you hold or have held, such as the type of account, maximum credit limit and terms and conditions for repayments.  <b>Consumer credit</b> means credit that is intended to be used wholly or primarily for personal, family or household purposes or in relation to residential property for investment purposes.
<b>Repayment history information</b>	For a consumer credit account that you hold or have held, details of whether or not you have made your repayments by the applicable deadlines and, in the case of overdue payments, when the payment was eventually made.
A statement that Tabcorp has made an information request about you to a credit reporting body	An <b>information request</b> is when Tabcorp asks a credit reporting body to provide it with credit reporting information about you.  <b>Credit reporting information</b> includes credit information (such as the information listed in this table) about you and information derived by a credit reporting body about your credit worthiness, such as your credit score and risk rating.
The type and amount of credit sought by you	The type and amount of consumer credit or commercial credit sought by you in an application, in connection with which Tabcorp has made an information request.
<b>Default information</b> about you	Default information is information about a payment that you are overdue in making as a borrower or guarantor that has been overdue for at least 60 days.
Payment information about you	If default information regarding an overdue payment is provided to a credit reporting body and then the overdue payment is subsequently paid, payment information is a statement that the amount of the overdue payment has been made.



New arrangement information about you	This is information about overdue payments by you in relation to consumer credit that Tabcorp has provided to you and about which Tabcorp has provided default information to a credit reporting body. New arrangement information about you is a statement that the terms and conditions of your original credit have been varied or that you have been issued with new credit in relation to the original credit.
<b>Court proceedings information</b> about you	This is information about a judgement of an Australian court that is made against you in relation to any credit that you have received or applied for.
Personal insolvency information about you	This is information about you that is entered in the National Personal Insolvency Index that relates to your bankruptcy, a debt agreement proposal given by you, a debt agreement made by you, a personal insolvency agreement executed by you, a direction given, or an order made, under the <i>Bankruptcy Act 1966</i> (Cth) that relates to your property, or an authority signed under that Act that relates to your property.
Publicly available information about you regarding credit worthiness	This is publicly available information about you that: (i) relates to your activities in Australia and your credit worthiness; and (ii) is not court proceedings information about you or information about you recorded on the National Personal Insolvency Index.
Tabcorp's opinion regarding serious credit infringement	Tabcorp's reasonable opinion (if applicable) that you have committed, in certain circumstances, a serious credit infringement in relation to consumer credit that Tabcorp has provided to you.  <b>A serious credit infringement</b> includes: (i) fraudulently obtaining, or attempting to obtain, consumer credit; (ii) fraudulently evading, or attempting to evade, your consumer credit obligations; or (iii) committing an act that indicates an intention to no longer comply with your consumer credit obligations and Tabcorp has been unable to contact you for at least 6 months in accordance with the Privacy Act.

**Credit eligibility information** includes:

- credit reporting information about you that was disclosed to Tabcorp by a credit reporting body in accordance with Part IIIA of the Privacy Act; and
- information that Tabcorp derives about you from credit reporting information that relates to your credit worthiness and that may be used in establishing your eligibility for consumer credit.

Policy last updated: 24 January 2017