

GROUP PRIVACY POLICY

1. PRIVACY AT TABCORP

Our privacy commitment

At Tabcorp, we are committed to privacy, transparency and information security. We understand that your privacy is important to you, and we value, trust and respect your personal information. This policy is designed so that you clearly understand how we collect, hold, use and disclose your personal information.

To honour this privacy commitment, we handle personal information in accordance with the *Privacy Act 1998* (Cth) (**Privacy Act**), the Australian Privacy Principles (**APPs**), and this Privacy Policy.

We take protecting your information very seriously. That's why we have a range of security measures in place to help manage and safeguard your information. All Tabcorp team members receive regular training to ensure they understand our obligations. Non-compliance with this policy is regarded by us as a serious matter and may result in disciplinary action, including termination of a team member's employment or engagement with us. We also require our suppliers to comply with the Privacy Act, the APPs and this Privacy Policy when handling your personal information. Tabcorp has the right to terminate arrangements with its suppliers who fail to comply with these requirements when handling your information on our behalf.

Tabcorp regularly reviews this policy and its practices around handling personal information to ensure that we are upholding our privacy commitment.

Your privacy is important to us, but why is this policy important to you?

Each Australian entity in the Tabcorp Group is bound by the Privacy Act and to the APPs. It's on us to keep you up to date about how we're managing and protecting your personal information. Reading this policy is the best way for you to understand how we handle your personal information.

2. ABOUT OUR PRIVACY POLICY

Companies covered by our Privacy Policy

Tabcorp Holdings Limited (ABN 66 063 780 709) and its subsidiaries own and operate consumer facing brands including TAB, Sky Racing, Sky Sports Radio, RadioTAB, MAX, Keno, The Lott, and Tabcorp Charitable Games (the **Tabcorp Group**).

Important definitions

In this Privacy Policy:

- the Tabcorp Group is also referred to as **Tabcorp, we, us, or our**;
- our employees and contractors are referred to as **team members**;
- our lotteries retail franchisees and agents are referred to as our **lotteries retailers**;
- our keno agents and licensed venues that offer keno are referred to as our **Keno venues**;
- our wagering agents and licensed venues that offer our TAB products are referred to as our **TAB venues**;
- our gaming venue partners who receive services from MAX are referred to as our **gaming venues**;
- our lotteries retailers, Keno venues, gaming venues and TAB venues are collectively referred to as **our retail network**;
- an **account** is an account or membership program that we offer to you via any Tabcorp website, mobile device application (App), or in our retail network that allows you to use our products and/or services;
- **personal information** means information or an opinion about you, or any information that can be used to identify who you are; and
- this Privacy Policy is also referred to as **policy**.

3. WHAT TYPES OF INFORMATION DO WE COLLECT AND HOLD?

Personal Information

We need to collect some of your personal information to provide you with our products and services and generally manage our business. On some occasions, the law, conditions of our licences, and gambling rules require us to collect it. The kind of personal information we collect depends on how and why you are engaging with us, but it could include:

- **contact information** – name, address, email address, and telephone number;
- **identification verification information** – date of birth, drivers' licence, passport, birth certificate, visa information and/or utility bills;
- **banking or payment details** - credit card, bank account, PayPal account details or other payment details;
- **your purchasing behaviour and transaction history with us**;
- **your online interactions** with our websites, Apps, social media channels, communications, and advertising and third-party websites and apps that display our advertising;
- **video and voice data** – voice recordings and data when you interact with us by telephone or through voice assistant technology; and video surveillance at certain Tabcorp premises and in our retail network; and/or
- **location, device and system data** – information about your device and system like your IP address, and your physical location via your mobile device information where you have opened an account with us, or accessed or used your existing account, using your mobile device – the specific location data collected depends on the platform you are using and your mobile device or account settings.

Do we collect sensitive information?

The Privacy Act places additional obligations and protections on your sensitive personal information such as your race, ethnicity, political opinions, religious or philosophical beliefs, sexual orientation, criminal record or health information.

There are occasions where we need to collect, use and disclose sensitive information. These are set out in section 10 and section 13 of this policy. If we need to collect this type of information, we'll ask your permission, except where otherwise allowed by law.

4. HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

Where possible, we will collect your personal information from you directly. We do this when you interact with us:

- via our websites, mobile Apps, social media channels, (including through cookies, see section 9);
- over the telephone;
- when using our product terminals; and/or
- by mail, email or in person.

Where it is not practical to collect your personal information from you, we may collect it from third parties and other sources. For example:

- credit reporting bodies and customer data validation service providers, who help assess your risk to our business under the AML/CTF Act and our "know your customer" obligations, see section 8 for more detail;
- our share registry provider;
- institutional investors (e.g. banks) that offer customers investment products incorporating Tabcorp shares;
- our retail network;
- a supplier of training, research, or marketing consultancy services to us;
- public sources (e.g. social media and search websites);
- our industry regulators; and/or
- any other relevant Commonwealth, state or territory government authority or agencies.

If you do not provide us with your personal information, we won't be able to provide our products and services to you and any account that you may hold will operate with restrictions. For example:

- if you don't provide the necessary information we require to verify your identity, we may place restrictions on your account and you may not be able to access our products or services, or access your funds until such time as we do verify your identity; and
- if you decline or are unable to provide information we're required to collect for customers using our wagering products and services under the AML/CTF Act, we may place restrictions on your account until you provide that information.

We may also be unable to:

- issue or administer any Tabcorp shares you have applied for (e.g. pay you dividends or send you important shareholder communication); and/or
- provide certain products and services to our retail network.

5. HOW DO WE USE YOUR PERSONAL INFORMATION?

We use (and at times disclose) the personal information we have about you to **provide you with our products and services** and to **manage our business**, which includes the following purposes:

- to meet our **legal requirements** - including to verify your age and identity;
- to perform **administrative and operational tasks** – including account management, systems development and testing, risk management, investigation of unlawful activity, staff training, maintaining our records, market and customer satisfaction research or collecting debts;
- to **manage, administer and improve the quality of our products and services** and our retail network;
- to **personalise your online experience and market our products and services** to you (for more information on marketing, please see section 9);
- to **undertake analytics activities** that inform our product development initiatives and marketing campaigns;
- to **administer our responsible gambling programs** (for more information on responsible gambling, please section 10); and
- for other reasons where the **law, the conditions of our licences and relevant rules** may require or allow us to use your personal information.

6. WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?

Where we share your personal information, we do so in accordance with this policy. Before we share it, we ensure we have appropriate arrangements in place with the recipients of your personal information requiring them to keep it secure and confidential. Depending on how you engage with us, we will disclose your personal information as follows:

- among the **Tabcorp Group**;
- where **you have consented** to that disclosure, for example, to a secondary contact you nominate;
- to our **third party service providers** that we engage directly to provide you with our products and services and manage our business, including:
 - third parties that help us manage our AML/CTF risks and obligations (see section 8 for more information);
 - third parties as part of our responsible gambling programs;
 - third parties that provide us with technology solutions to manage our business and support our platforms;
 - our print partners when we send you direct mail; and
 - third parties that provide us with marketing consulting, research and / or targeted advertising services,
- to our **industry regulators** so that we can respond to enquiries, to comply with laws and comply with the conditions of our licences;
- to **credit reporting bodies** (for more information on credit reporting bodies, see section 8);
- to our **professional advisers**, consultants, contractors and subcontractors;
- to banks, financial institutions and **payment processing providers** so that we can process any payments to you;
- to our **retail network** so that it can provide you with our products and services;

- to our **racing industry and sporting industry partners** to help them maintain the integrity of a sport or racing code; and
- to our **charity partner**, The 50-50 Foundation Ltd so that it can send you information about its products and services (see section 9 for more information).

7. DISCLOSURE OF YOUR PERSONAL INFORMATION OVERSEAS

Sometimes the third parties we disclose your information to are overseas. For example, some of the service providers who provide us with marketing, identification and fraud detection services, cloud and data storage services, and technology support are in:

- the United States of America;
- the United Kingdom;
- Japan;
- Ireland;
- India;
- Philippines;
- Poland; and
- Vietnam.

If we send your information overseas, we take all commercially reasonable steps to make sure that any overseas recipient handles your information in accordance with the APPs.

8. HOW DO WE USE YOUR CREDIT INFORMATION?

Sometimes we are required to verify your age and identity before we can provide you with our products or services. We use credit reporting bodies to assist us with this. Credit reporting bodies use the names, residential address and dates of birth contained in credit information files relating to you and other people to prepare an assessment to verify your age and identity.

By using our products and services or accessing an account that you hold with us, you expressly agree and consent to us:

- disclosing your name, residential address and date of birth to credit reporting bodies; and
- asking credit reporting bodies to assess whether the information we provide to them matches the information they hold about you in their credit information files.

If we can't verify your age and identity using that information, we will notify you.

If you do not wish to have your identity verified by a credit reporting body, you must contact the customer service team relevant to the products and services you are seeking to use or access and we can discuss other options with you.

- TAB – wagering customer service team on 131 802
- The Lott – lotteries customer support team on 131 868
- Keno – Keno customer support team on 1800 056 066

Where you use a wagering product or service or access a wagering account, we do this to help us verify your identity for the purpose of the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) (**AML/CTF Act**). The obligations we have under the AML/CTF Act may require us to:

- request additional personal information from you (e.g. confirmation of your account transactions, your occupation and / or your employer);
- collect information about your transactions on any accounts, including any email you send to us, and to report activity externally;
- collect other information about you that we reasonably require to help assess your risk to our business; and / or
- disclose any of that information to our regulators, industry bodies, and other gambling operators.

9. DIRECT MARKETING AND RESEARCH

Direct Marketing

We use your personal information to send you information and show you advertisements about our products and services that we think you would be interested in. Generally, we will only use your personal information to tell you about the products and services that you seek to use directly. For example, if you hold a Keno account with us, we will use your personal information to tell you about products and services that are relevant to Keno. Sometimes, we will also use your personal information to tell you about our other products and services, or the products and services of:

- our racing and sporting industry partners;
- our charity partner, The 50-50 Foundation Ltd;
- our retail network;
- our club and hotel industry partners.

We may tell you about these things directly by mail, email, SMS text message, push notifications (if they are enabled on your device), MMS or phone calls. We may also show you advertisements via targeted online advertising on other websites and personalised advertising on our own websites and mobile Apps. There is more detail on how we do this, and how you may opt-out, below.

Targeted online advertising

As mentioned above, we also use your personal information to market our products and services to you using internet-based marketing tools. We use digital platforms such as Facebook, Google, LinkedIn, Instagram and Adobe as well as marketing agencies to deliver services that we've asked them to provide, and to allow them to tell you about our products and services that may be of interest to you based on your recent interactions with us.

These companies do not use your personal information for their own purposes.

We may have our marketing agencies contact you using your personal information that they already hold, or we may provide your personal information to them to serve you with more relevant advertising about our products and services.

You can hide most targeted advertising by following the prompts in that advertising. Hiding that advertising means you won't get served online advertising because of the personal information we hold and disclose. You may still see similar advertisements based on your anonymous browsing history and untargeted advertisements.

Personalising your visit to our website and mobile Apps

If you use our website or mobile Apps we may show you personalised offers and content. We can do this using your customer or account numbers and by using cookies. Cookies allow a website or application to identify and interact with your computer. Cookies are small files that store information on your computer, TV, mobile phone or other device. They enable us to recognise you across different websites, services, devices and browsing sessions. This can take the form of automatically assigning you to the correct jurisdiction based on your location, altering website navigation based on your most visited pages or displaying game or event information based on your previous browsing or purchase history.

From time to time we may also use cookies from third party websites (for example, those that display our advertising) to personalise your online experience with us.

You can disable cookies through your internet browser settings. You can also delete cookies from within your browser's cache. If you disable or delete your cookies, you may still use our websites, but may not have access to certain parts of our websites.

Analytics

We derive aggregated and personalised insights about our businesses and brands from the personal information that we hold. These insights assist us in identifying trends and patterns that ensure we are developing the right products and services for our customers. This information also informs our marketing campaigns and helps us assess the effectiveness of the campaigns.

Opting-out of direct marketing

You can opt-out of receiving direct marketing communications anytime. How you opt-out will depend on the channel you received or saw the communication in. Each marketing communication will contain the specific instructions for you to opt-out.

If you are unable to locate this opt-out information, you may contact the relevant customer service centre below and they will record your marketing preference.

- TAB – wagering customer service team via the online form located at help.tab.com.au/s/contactsupport
- The Lott – customersupport@thelott.com
- Keno – help@keno.com.au
- MAX – max@tabcorp.com.au

10. RESPONSIBLE GAMBLING

Tabcorp is committed to delivering its products and services responsibly by supporting a well-regulated and responsible gambling industry, characterised by integrity at all levels. We take responsible gambling very seriously, and when you interact with us, we use your personal information to inform and maintain initiatives like our education campaigns, self-exclusion programs, pre-commitment limits, research and supporting counselling services.

Sometimes, we will collect your sensitive information (for example, your health information) so that we can administer our responsible gambling programs. Where we do this, we will only use this information for the purpose it was collected.

We may also monitor transactions on your accounts, emails you send us and information you provide to us during telephone calls to support you and enable you to make informed choices in line with our responsible gambling programs.

If we collect your personal information (that is not also health or other sensitive information) through a responsible gambling program, we use it for internal monitoring and to unlock insights that help us understand the impact our products, services and experiences have on our customers more broadly.

You can read more about our responsible gambling programs by visiting tabcorp.com.au/corporate-responsibility/responsible-entertainment.

11. HOW DO WE KEEP YOUR PERSONAL INFORMATION SECURE?

We've built security measures into our systems and processes to protect your personal information.

We store any hard copy and electronic records of your personal information in secure buildings and systems and only use trusted third party cloud storage providers. You can rest assured that we have various measures in place to protect and safeguard the personal information that we hold. We:

- train our team members in how to keep your information safe and secure;
- maintain computer and network security by using firewalls, identification codes and passwords;
- implement physical security such as locks and other security systems at our venues in our retail network; and
- maintain and monitor our online security systems, which includes restricting unauthorised access and backing up our systems.

Do we combine your personal information?

In some instances, where you have more than one account with us, we will combine your personal information into one account. This will only occur within a brand you are dealing with, and not across our brands. For example, if you have an online lotteries account and an account with a lotteries retailer, we will match those accounts so that it is easier for you to interact and receive services from us.

12. HOW CAN I ACCESS, UPDATE OR CORRECT MY PERSONAL INFORMATION?

The accuracy of the information we hold about you is as important to us as it is to you. We will take reasonable steps to ensure the information we collect, use and disclose is accurate and complete.

How can I access my personal information?

You can ask us for a copy of the personal information we hold about you, by writing to us.

Email: privacy@tabcorp.com.au

Mail: Level 8, 180 Ann Street, Brisbane QLD 4000

We will need to verify your identity before we can process your request.

Is there a fee? There is no fee to ask for your information, but we may charge you an access fee to cover the time we spend finding and putting together the information you have a right to ask for. We will tell you any charges before we incur them.

How long will it take? The information we agree to provide to you will usually be available in 30 days of your request.

Can we decline access? In some cases, yes. In other cases, we may only give you access to certain information. For example, we might not let you see information that is commercially sensitive or where it has an unreasonable impact on the privacy of others or if we are investigating possible illegal activity and giving you access might affect those investigations. If we do this, we'll let you know why. If you disagree with us, you can let us know using the complaints procedure which we outline below.

How can I update or correct my personal information?

It's important that we have your correct information details, especially your contact information. You can check and update some of the information we hold about you by logging in to your account on our websites or Apps, or by calling us. You can ask us to update or correct the personal information we hold about you, by contacting the customer support team of the Tabcorp brand you are dealing with or by writing to us.

Email: privacy@tabcorp.com.au

Mail: Level 8, 180 Ann Street, Brisbane QLD 4000

We won't charge a fee for this.

It's not always possible to remove or modify information in our databases, but we'll take reasonable steps to correct your personal information and action your request. If we decline your request, we'll let you know why and you can ask us to attach your incorrect personal information to a statement detailing that it is inaccurate.

If the incorrect information was disclosed to someone else pursuant to this policy, you may ask us to notify the third-party of the correction we've made. We will take reasonable steps to action your request.

13. THINKING OF WORKING FOR US OR WORKING IN OUR RETAIL NETWORK?

If we collect personal information about you for the purpose of working for us or in our retail network, we will collect, use and disclose it in accordance with this privacy policy. This section of our privacy policy explains some of the additional types of information we collect and different ways we use and disclose as part of the application process and your ongoing employment or engagement with us.

Working for us or participating in our training programs

If you're a team member, looking to become one, joining one of our training programs, or are otherwise engaged by us as a part of our workforce (directly or indirectly, e.g. as an employee of a labour supply company), we collect and hold personal information about you including:

- **contact information** – name, address, email address, and telephone number;
- **application information** – academic results and qualifications, expertise and experience, employment history, personal interests, salary expectations;
- **information regarding your right to work** – citizenship, migration and/or visa status; and
- **sensitive information** – criminal record, whether you are a politically exposed or sanctioned person, whether you are of Aboriginal or Torres Strait Island descent, any disability you may have; and
- your **tax file number**.

We will, where possible, collect this information from you directly. However, we may also:

- collect your personal information from a third-party supplying recruitment services to us, or a referee nominated by you; and/or
- search government records and publicly available sources, including social media and other internet sources.

How do we use this information?

- We use other personal information you provide to assess your suitability for a role with us.
- We use information regarding your right to work to determine whether you are legally entitled to work in Australia.
- We use background information about you, as part of our assurance program on the identity, honesty and integrity of prospective and current team members.
- We use your tax file number to assess our obligations to withhold any applicable taxes as well as to ensure our own compliance with regulations.
- We use information regarding whether you are of Aboriginal or Torres Strait Island descent, and/or any disability you may have, for the purpose of reporting de-identified data to relevant government and regulatory authorities.

Background checks may require us to disclose information about you to our regulators and to other third parties.

Working in our retail network

If you're employed in our retail network, we may collect and hold personal information about you including:

- **contact information** – name, address, email address, and telephone number;
- **employment details** – copies of pay slips, rosters, proof of payment of wages, proof of payment of superannuation;
- **information regarding your right to work** – citizenship, migration and/or visa status; and
- your **tax file number**.

We will, where possible, collect this information from you directly. However, we may also require your employer to release its records containing your information. Where we collect this information, it is to monitor your employer's compliance with relevant workplace laws including those under the *Fair Work Act 2009* (Cth) and/or where we suspect there is, or may be, an area of non-compliance by your employer.

14. HOW CAN YOU MAKE A PRIVACY COMPLAINT?

If you have a concern about how we have handled your personal information or your privacy, let us know straight away so we can take steps to address your concern.

How can you make a complaint?

If we don't address your concern when you first raise it, you can make a complaint and we'll do our best to resolve it for you. To make a privacy complaint, please contact our Privacy Officer in writing.

Email: privacy@tabcorp.com.au

Mail: Level 8, 180 Ann Street, Brisbane QLD 4000

It's helpful to us if your written complaint includes a brief description of what happened and when, and what outcome you'd like.

How do we manage complaints?

We treat all privacy complaints seriously. After you have lodged your complaint in writing, we will:

- investigate the circumstances of your complaint;
- assess your complaint with the aim of resolving it in a timely and efficient manner; and
- take steps to respond to you in a reasonable time, usually 30 days.

We ask that you cooperate with us during the complaints process and provide us with information we may need to investigate and assess your complaint.

What else can you do?

If you're not satisfied with how we manage your complaint or if our decision does not resolve your complaint, you may contact the Office of the Australian Information Commissioner (OAIC).

Email: enquiries@oaic.gov.au
Mail: GPO Box 5218, Sydney NSW 2001
Phone: 1300 363 992
Visit: oaic.gov.au

15. HOW TO CONTACT US

If you have any questions or wish to provide feedback about how we treat your privacy or handle your personal information, please get in touch!

The Privacy Officer

Email: privacy@tabcorp.com.au
Mail: Level 8, 180 Ann Street, Brisbane QLD 4000
Phone: 07 3877 1010

Current from	1 July 2021	Sponsor	Chief Legal & Risk Officer
Replaces version dated	15 January 2021	Review period	Annual
Approved By	MD & CEO		