

**Victorian Bookmakers' Association Limited**  
**Protecting Your Privacy**

**1. Our commitment**

- 1.1 The Victorian Bookmakers' Association Limited (ABN 45 004 236 677) (**VBA/we/us/our**) is committed to providing you with the highest levels of customer service, which includes following our privacy protection obligations. We are bound by the *Privacy Act 1988* (Cth), which sets out principles concerning the protection of your personal information (the Australian Privacy Principles (**APPs**)). This policy describes how we manage your personal information and safeguard your privacy.
- 1.2 By providing us with personal information about yourself, you consent to the collection, use, disclosure, and transfer of your personal information as set out in this policy. VBA recommends that you keep this policy for future reference.

**2. Your personal information**

- 2.1 We only ever collect your personal information that is necessary for us to:
- a) lawfully and ethically carry on our business;
  - b) provide employment;
  - c) provide the services our members require;
  - d) identify potential suppliers, contractors and consultants with whom we may wish to deal at some stage;
  - e) let our members know about other VBA or related services which may interest them; and
  - f) assist us generally in managing transactions with our members, suppliers, contractors and consultants.
- 2.2 Personal information held by VBA may include your:
- a) name;
  - b) current and previous addresses;
  - c) telephone/mobile phone number;
  - d) email address;
  - e) bank account or credit card details;
  - f) Tax File Number;
  - g) Australian Business Number;
  - h) occupation;
  - i) driver's licence number;
  - j) VBA username or password; and
  - k) details of your VBA services (including their status).

- 2.3 If you choose not to provide certain personal information, VBA may not be able to provide you with the services you require, or provide the level of service on which we pride ourselves.
- 2.4 Please also be aware that there are some situations where we are required by law to collect personal information on you. In such circumstances, we will inform you of the law that imposes this requirement as well as the name of the Australian law or details of the court/tribunal order that requires or authorises the collection.
- 2.5 The kinds of personal information we collect and hold will depend upon the types of dealings you have with us in respect of VBA or related services we provide to you, including member services, or obtain from you. Personal information may be contained in:
- a) information you give us when you request a service or information (direct or referred) from us, subscribe to our newsletters or like us or otherwise connect with us on social media platforms;
  - b) postings you make on any blog or other forums on any website we may operate;
  - c) any other publicly available sources of information;
  - d) information from the organisations identified below under “**When we disclose your personal information**” at items **3.2** and **3.3**;
  - e) our records on how you use VBA’s services;
  - f) our records of communications between us and yourself, including in relation to any complaints or enquiries;
  - g) credit or banking related information necessary to process payment; and
  - h) information about the use of our services (direct or referred), or your opinions about those services, recorded when you respond to a survey or the like.
- 2.6 Please note that wherever possible we will seek to collect personal information only from you. We will only look to other means wherever it is unreasonable or impractical to collect the information from you directly. If we ever collect information from third parties, or it is possible that you are not aware of our having collected your personal information, we will notify you of the collection and the circumstances of the collection as soon as possible.
- 2.7 In the more common circumstances of VBA collecting information directly from you, and we believe that you are most likely aware of our collection, we will generally still endeavour to inform you why the information is being collected, unless the reason for the collection is self-evident.
- 2.8 You may occasionally need to provide personal information about other individuals to VBA (e.g. about your authorised representatives). If so, we rely on you to inform those individuals that you are providing their personal information to VBA and to advise them that we can be contacted for further information (see our **contact details** below).
- 2.9 Your personal information may be used to:
- a) verify your identity;
  - b) assist you to subscribe to VBA’s current services;
  - c) offer you and provide additional VBA or related services;

- d) administer and manage those services, including charging, billing and collecting debts;
  - e) inform you of ways the services provided to you could be improved;
  - f) conduct appropriate checks, including for credit worthiness and fraud;
  - g) research and develop VBA's services;
  - h) gain an understanding of your information and communication needs in order for VBA to provide you with a better service;
  - i) maintain and develop VBA's business systems and infrastructure, including testing and upgrading of these systems; and
  - j) send you direct marketing if you permit us to do this (see **item 2.10** below).
- 2.10 Your personal information is also collected so that VBA can provide, promote and also market its services to you (including by way of direct mail, email, telemarketing, and SMS messages). VBA does this to keep you informed of our services. If you do not wish us to promote and market our services, please call **+61 3 9376 1933**. In relation to marketing and promotional material sent via email, VBA will send such material to you unless you indicate you wish to opt-out by selecting this option in the email. If any problem occurs with your attempts to select the email opt-out option, please call us to report the issue and to opt-out, or alternatively email us directly at [info@vicbookmakers.com.au](mailto:info@vicbookmakers.com.au).
- 2.11 Where practical, you may interact with us anonymously or using a pseudonym. For example, providing feedback to VBA that does not require a response from us. In many cases, however, it will not be practical or possible to interact with us anonymously or using a pseudonym, as we will need your personal information to provide the services or information you are requesting. As an example, if you wish to subscribe to an email newsletter, then we will need an email address from you. We may also be required or authorised by law to only deal with individuals who have identified themselves, such as under Australian legislation or a court/tribunal order.
- 2.12 Sensitive information is personal information such as health information and information about racial or ethnic origin, religious beliefs, orientation, political opinions and/or criminal record. This information is generally afforded a higher level of privacy protection. In order to comply with privacy legislation obligations, we will collect sensitive information only where it is reasonably necessary to do so and you have consented, or we are required to do so by law. We may be required by law where there is a requirement or authorisation set out in any Australian legislation, an order from an Australian court/tribunal or where a "permitted general situation" exists as defined in the *Privacy Act*.
- 2.13 We do not generally disclose personal information to any recipients based overseas. If this changes, we will endeavour to update this policy as soon as possible. If at any point in time your personal information is disclosed to an overseas-based recipient (which may occur before this policy has been updated), we will notify you of the likely recipients, the country or countries which they are usually based in, and the reasons for the disclosure. We will also take all reasonable steps to ensure that the overseas recipient does not breach the applicable APPs.
- 3. When we disclose your personal information**

- 3.1 Any personal information we collect about you will only be used for the purposes for which it is collected. It may be used or disclosed for another purpose in the following circumstances:
- a) you have given us express permission to do so;
  - b) it may be used for related purposes (such as to improve our services or website) or for directly related purposes (if sensitive information) if you would in the circumstances reasonably expect us to disclose the information; or
  - c) we are legally obliged to do so.

The above commonly occurs when VBA discloses the information to organisations outside VBA as described below in **items 3.2** and **3.3**.

- 3.2 In order to deliver the services you require, we may disclose your personal information to organisations outside of VBA. These organisations may carry out VBA's:
- a) customer enquiries;
  - b) mailing operations;
  - c) billing and debt-recovery functions;
  - d) information technology services;
  - e) installation, maintenance and repair services;
  - f) marketing and telemarketing services;
  - g) market research; and
  - h) website usage analysis.

- 3.3 VBA may also disclose your personal information to:
- a) your authorised representatives or your legal advisers (such as if you request us to);
  - b) credit-reporting and fraud-checking agencies;
  - c) credit providers (for credit-related purposes such as credit-worthiness, credit rating, credit provision and financing);
  - d) VBA's related companies;
  - e) third parties necessary to process and analyse data we collect on our websites, primarily to help us to improve our services;
  - f) VBA's professional advisers/partners, including its accountants, auditors and lawyers, and any other affiliates or third parties necessary to process your transactions or service your membership account with the VBA;
  - g) other information technology service providers (for example, if you obtain services from other providers, VBA may need to disclose your personal information for billing purposes);
  - h) corporations and related persons as part of a corporate transaction involving, amongst other things, the transfer of all or part of its assets or as part of a corporate restructure; and
  - i) government and regulatory authorities and other organisations, as required or authorised by law.

- 3.4 VBA takes reasonable steps to ensure that the organisations listed in **items 3.2 and 3.3** above are bound by confidentiality and privacy obligations in relation to the protection of your personal information.
- 3.5 Once we no longer require your personal information for any of the purposes for which it was collected, we will, subject to any legal obligations and responsibilities, take steps to destroy or de-identify your personal information.

#### **4. How VBA protects your personal information**

- 4.1 When transmitting personal information to us through the internet, you should keep in mind that any internet transmission is not completely secure or error-free and you should take special care in deciding what personal information to send to us.
- 4.2 We take all reasonable steps to protect your personal information from loss, misuse, modification, or unauthorised access and disclosure. These steps include access control for our premises, confidentiality obligations imposed on our employees and use of security measures for computer system access.
- 4.3 We do not, however, accept any responsibility for the unauthorised access or use of personal information held by us. To the fullest extent permitted by law, we disclaim all liability and responsibility for any damages you may suffer due to any loss, unauthorised access, misuse or alteration of your personal information, either during transmission of that information to us or after we receive it.
- 4.4 You may from time to time have access to websites operated by companies unrelated to us through links on our own website. Those unrelated websites are not subject to our privacy standards and we are not responsible for their privacy practices or the content of such other websites. You should contact those websites directly to ascertain their privacy standards, policies and procedures.

#### **5. VBA's website**

- 5.1 VBA provides services via its website. When you visit VBA's website, our web servers record anonymous information such as the time, date and URL of the request. This information assists VBA to improve the structure of our website and monitor its performance.
- 5.2 VBA may use "cookies" on its website. Cookies are an industry standard and most major websites use them. A cookie is a small text file that our website may place on your computer. Cookies are usually used as a means for VBA's website to remember your preferences, as such, cookies are designed to improve your experience of VBA's website.
- 5.3 In some cases, cookies may collect and store personal information about you. VBA extends the same privacy protection to your personal information whether gathered via cookies or from other sources. You can adjust your Internet browser to disable cookies or to warn you when cookies are being used. If you do disable cookies, however, you may not be able to

access certain areas of our websites or take advantage of the improved website experience that cookies offer.

- 5.4 VBA also collects Internet Protocol (IP) addresses. IP addresses are assigned to computers on the internet to uniquely identify them within the global network. VBA collects and manages IP addresses as part of the service of providing internet session management and for security purposes.

## 6. Changing your personal information

- 6.1 VBA takes all reasonable precautions to ensure that the personal information it collects, uses and discloses is accurate, complete and up-to-date. The accuracy of that information, however, depends to a large extent on the information you provide. It is for this reason VBA highly recommends that you:

- a) let VBA know if there are any errors in your personal information; and
- b) keep VBA up to date with changes to your personal information including but not limited to your name, address or bank account details.

- 6.2 If you are a subscriber to one of VBA's services, including as a member, you may change your personal details by contacting VBA on **+61 3 9376 1933** or [info@vicbookmakers.com.au](mailto:info@vicbookmakers.com.au). Please contact us as soon as possible if any of the situations described in **items 6.1(a)-(b)** above occur at any stage.

- 6.3 If we have disclosed your information to another entity or other third party, we will notify them of the corrections to your information if you request us and may forward them a copy of the corrected information.

- 6.4 We will respond to any request to correct personal information within a reasonable period after the request is made. The length of time which is reasonable will depend on the individual circumstances of each information change request.

- 6.5 If for any reason we cannot comply with your request to correct your information, we will send you a written notice setting out:

- a) the reasons for the refusal (except to any extent that it would be unreasonable for us to do so);
- b) how you may complain about our refusal; and
- c) any other matter prescribed by the *Privacy Regulation 2013* (Cth) (**the Regulations**).

## 7. Accessing your personal information

- 7.1 In most cases, you can gain access to personal information held about you, subject to certain exceptions allowed by law. You can contact us if you would like details of your personal information which we may hold, as well as if you would like us to change or correct

it as described in **items 6.1** and **6.2** above. We will handle any request in accordance with the relevant privacy legislation.

- 7.2 If you would like to contact us for access to your personal information, you will need to put your request in writing for security reasons, and either send it by mail to **Victorian Bookmakers' Association Limited, 400 Epsom Road, Flemington, Victoria, Australia, 3031**, or by email to [info@vicbookmakers.com.au](mailto:info@vicbookmakers.com.au).
- 7.3 We reserve the right to charge you a reasonable fee for providing access to personal information we hold about you. We will deal with requests as quickly as possible, but requests for a large amount of information, or information which is not currently in use, may require time to process.
- 7.4 If you have any other questions in relation to privacy, are concerned that we have breached your privacy, or concerned that we have otherwise breached or failed to follow the APPs and you would like to make a complaint, please contact VBA on **+61 3 9376 1933**, write to our **Executive & Operations Officer, Victorian Bookmakers' Association Limited, 400 Epsom Road, Flemington Victoria 3031 Australia**, or send an email to [info@vicbookmakers.com.au](mailto:info@vicbookmakers.com.au).
- 7.5 If we refuse to grant you access to your information for legal reasons, we will send you a written notice setting out:
- a) the reasons for the refusal (except to any extent that it would be unreasonable for us to do so);
  - b) how you may complain about our refusal; and
  - c) any other matter prescribed by the Regulations.

## **8. Policy updates**

We may change our privacy policy from time to time to comply with new laws or industry codes of practice which are developed, or to comply with VBA's own changes to our means of handling information. It is your responsibility to refer to our privacy policy from time to time to familiarise yourself with any changes. We encourage you to visit our website regularly for any updates to this policy.

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