PRIVACY POLICY

This privacy policy applies to Ladbrokes Digital Australia Pty Ltd (ACN 151 956 768 and its Related Bodies Corporate (as that term is defined in the Corporations Act 2001 (Cth)) (the Group). In providing betting services to clients, we are committed to ensuring the privacy of everyone we deal with, and to providing you with the highest levels of customer service. This privacy policy sets out how we deal with personal information and credit information. It applies to information obtained through our websites and our business generally, but does not apply to any linked website which we do not operate.

The Group attaches great importance to safeguarding its customer information.

The Group has in place systems and processes that comply with the Commonwealth Privacy Act 1988 (Privacy Act). Our systems and processes comply with the Australian Privacy Principles, which protect our customers and are the basis of the Privacy Act.

These principles state that data must be:

1. Fairly and lawfully processed;
2. Processed for limited purposes;
3. Adequate, relevant and not excessive;
4. Accurate;
5. Not kept for longer than is necessary;
6. processed in line with your rights;
7. Secure; and
8. Not transferred to countries without adequate protection.

PERSONAL INFORMATION

The Group collects personal information (including credit information) in the provision of our wagering services to you, including the marketing of our wagering services.

The types of personal information the Group collects and records may include:

- Your name and contact details;
- Banking/payment details (eg. account numbers, credit card numbers);
- Your betting history with the Group;
- Correspondence to and from you such as emails and live chat;
- Information on your use of the Group websites and Apps using cookies and tracking technologies, or other behavioural marketing indicators;
- Your physical location;
- Information about your financial circumstances and source of income;
- Information we may collect as part of a survey, customer feedback request or a competition you participate in; and
- Your application for employment.

If necessary, the Group may also ask you to provide additional personal information from time to time.

This is collected in a number of ways including:

- directly from you when you enter your personal details on our website/s to open an account or update your details;
- from your use of our websites, apps or other websites;

- when you email or telephone us or engage in live chat; and
- from publicly available sources of information, including third parties from whom we may acquire lists.

The Group will tell you why we are collecting information when we collect it and how we plan to use it or these things will be obvious when we collect the information. If you choose not to provide us with information we may be unable to supply products or services to you.

USE OF PERSONAL INFORMATION

The Group usually collects personal information to:

1. Provide our products and services to you;
2. Identify you and to assist you to obtain the Group products and services you require;
3. Administer and manage these services including opening and the ongoing settlement of your wagering account;
4. Monitor and detect possible fraud or breaches of our terms and conditions of service;
5. Process payments for our products and services;
6. Improve our products and services;
7. Conduct appropriate checks for credit worthiness and for fraud;
8. Conduct research and develop and improve our products and services;
9. Gain an understanding of your needs in order to provide you with better and more personalized products and services tailored to your requirements; and
10. Promote and market our products to you.

When the Group collects personal information from you, we will provide you with the opportunity to indicate that you do not want this disclosed for marketing or secondary purposes. You can contact our Customer Support team at any time to notify of your requirements or preferences.

CREDIT INFORMATION

The Group collects credit information in the provision of our credit services to you.

The kinds of credit information that we collect includes:

1. identification information;
2. consumer credit liability information;
3. repayment history information (information about your credit history);
4. default information (information relating to a particular default, such as the date of the default and the amount);
5. payment information;
6. new arrangement information;
7. employment details;

8. court proceedings information;
9. personal insolvency information;
10. publicly available information; and
11. credit eligibility information (information disclosed to us by a credit reporting body or collected by us to determine whether to give you credit).

This is collected in a number of ways including:

- directly from you when you apply for a credit facility with the Group;
- from credit-reporting bodies;
- from other credit-providers;
- publicly available information.

The Group usually collects and holds credit information from you:

1. to enable the Group to perform its credit obligations to you;
2. to enable the Group to ensure you perform your credit obligations;
3. to enable the recovery of debt;
4. to maintain a credit information file on you;
5. to carry out a credit assessment on you;
6. for planning, research, promotion and marketing of the Group's products and services; and
7. for analytical purposes.

The Group may disclose your credit information to:

1. credit reporting bodies
2. organisations associated with the provision of the Group's services, such as associated data centres;
3. debt collection agencies and lawyers;
4. potential purchasers of, or investors in, any business conducted by the Group;
5. law enforcement agencies to assist in the prevention of criminal activities; and
6. any other persons or entities where we are required or authorised by law.

The Group currently discloses personal information to the credit reporting bodies Veda and Dun & Bradstreet. For further information about either organisation, or if you have any questions as to how they treat your personal information, please contact them directly via their respective websites www.veda.com.au and www.dnb.com.au.

The Group does not disclose your credit information to entities that do not have an Australian connection.

For information about how credit reporting bodies deal with your credit information, and your rights in this regard, please refer to our Statement of Notifiable Matters (see below).

USE BY THIRD PARTIES

The Group does not sell customer information to any third party. The Group may share your personal information with our Related Bodies Corporate or other Companies with whom we have a relationship. Some of these sites may be co-branded with our logo, however, these sites are not operated or maintained on our behalf. These links are for the convenience of the user, however, we cannot accept responsibility for the content or practices of websites operated by third parties that are linked to our sites.

We may also provide information to service providers and contractors who assist us in operating our business, for example to payment service providers and companies that provide identification verification services (such as Green ID and VEDA) or to providers of our ATM card (such as E Merchants and Cuscal).

We may also disclose information to a government agency, law enforcement or a regulatory body if requested by them, or if the disclosure is required by law or otherwise permitted by the Privacy Act.

ACCESS BY REGULATORY, RACING AND SPORTING BODIES

In accordance with the rules of racing and other obligations in various jurisdictions, betting transactions conducted over the internet and the telephone (including but not limited to telephone calls, as well as transactions to and from an individual's computer) may be observed and recorded by us and by the relevant regulatory, racing or sporting body. Additionallythese bodies may be granted access to review personal information collected by us for reasons including but not limited to ensuring the integrity of racing, sporting and other events.

DVS

For the purposes of verifying your identification using the Document Verification Service you confirm that you are authorised to provide the details that you provide to us during the account sign-up and identity verification process. This information is sought and used for the purpose of undertaking an information match request in relation to relevant Official Record Holder information and that a corresponding information match result will be provided via the use of third party systems. You acknowledge and consent to the use and access of your information in this way.

SECURITY AND STORAGE

The Group may store customer information (including personal information and credit information) in a variety of formats, including electronic or paper formats.

The Group takes reasonable steps to ensure that your personal information is stored securely. Transmissions sent to or from our website/s are routinely monitored for quality control and systems administration. The Group cannot guarantee the total security of any data transmission over the Internet, however, we strive to protect your personal information to the extent possible. A variety of physical and electronic methods are used, including restricting access to offices, databases and firewalls to keep personal information secure from misuse, loss or unauthorized use. Amongst the most important information the Group collects, is credit card information. The Group operates secure servers, using high-level encryption, to minimize the risk of unauthorized use of this type of information.

We may disclose your personal information overseas to our Related Bodies Corporate in the UK or to our contractors, including providers of payment services, in countries including the US, the UK, New Zealand and Germany.

CHILDREN'S PRIVACY

The Group takes our responsibility to protect children from the social impact of wagering seriously, until they are legally able to make such decisions. The Group will not accept information from minors for the purpose of opening a wagering account. It is however, ultimately the responsibility of the parents or guardian/s to monitor their children's Internet activities and, if desired, to use appropriate screening software.

ACCESS TO AND CORRECTION OF PERSONAL AND CREDIT INFORMATION

You have the right to access most personal information and credit information the Group holds about you, and if we deny access in certain circumstances, we will tell you why. If you would like to do so, please let us know by sending an email to the Customer Service Manager. We will provide you with a copy of your personal information within a reasonable period after the request is made, usually within 30 days. In some cases, we may charge a reasonable fee to provide access to your personal information, but we will never charge you a fee to make a request. If a fee will apply, we will advise you before we provide access.

If you would like to make a correction to any personal information or request a correction to credit information the Group holds about you, please let us know by sending an email to the Customer Service Manager.

If there is a reason for not granting you access to your information, or making a correction to any personal information, we will provide you with a written explanation of the reasons for the refusal (unless unreasonable to do so) and inform you of the mechanisms to complain about the refusal.

- If you have requested us to consider making a correction to your credit information: If we are satisfied that the credit information requires correction, we will take such steps as are reasonable, if any, in the circumstances to correct the information within thirty (30) days of the date on which you make the correction request. This period may be extended if you agree in writing.
- If we correct the credit information, we will provide you with a written notice of correction within a reasonable period of time.
- If we do not correct the credit information, we will provide you a written notice stating that the correction has not been made, which will also include our reasons for not making the correction.

PUBLIC INFORMATION

Information posted on bulletin boards or communicated within a chat room becomes public information. The Group cannot guarantee the security of this type of disclosed information.

COOKIES

A "cookie" is a small data file that a website may write to your hard drive when you visit it. A cookie file can contain information, such as user ID that the website uses to track the pages you have visited. The only personal information a cookie can contain is information you personally supply. A cookie cannot read data off your hard drive or read cookie files created by other websites. You can control the use of this data by setting your browser to notify you when you receive a cookie, giving you the opportunity to accept or reject it.

WHAT ELSE SHOULD YOU KNOW?

Remember to close your browser when you have finished your user session. This is particularly necessary if you share a computer with someone else, or you access a computer in a public place.

You, as an individual, are responsible for the security of, and access to, your own computer. Ultimately, you are solely responsible for maintaining the secrecy of your username, password and account information. Please exercise extreme care when you are using the Internet and our website/s.

UNSUBSCRIBE

In order to communicate important account and promotional information, you will receive e-mail and hard mail from us. Should you not wish to receive communications of this nature, please e-mail our Customer Service team to indicate your communication preferences.

FURTHER INFORMATION AND COMPLAINTS

For information about how credit reporting bodies deal with your credit information, and your rights in this regard, please refer to our Statement of Notifiable Matters.

For further information, or if you would like to make a complaint about our use or disclosure of your personal information, please contact our Customer Support team. Following receipt of your complaint, we will investigate and respond to you within a reasonable period of time.

If your complaint relates to our treatment of your credit information, we will give you written notice acknowledging that the complaint has been made and setting out how we will deal with the complaint in the particular circumstances. We will give you written notice again when we have made a decision about the complaint, outlining the decision, and providing you with information about dispute resolution mechanisms open to you if you are unsatisfied with the decision.

If you would like more information about the Privacy Act or Australian privacy requirements in general, please visit the Office of the Information Commissioner's website at www.oaic.gov.au.

CHANGES TO THIS POLICY

From time to time we will review this privacy policy and we reserve the right to change the policy at any time. Changes to the policy will come into effect immediately upon notification on our website.

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