

PRIVACY POLICY

2 September 2022

General

This is the privacy policy (“**Privacy Policy**”) for BlueBet Pty Ltd (ABN 42 607 521 835) (“**BlueBet**”). BlueBet is subject to the *Privacy Act 1988* (Cth) (“the Privacy Act”). In this Privacy Policy, a reference to *Australian Privacy Principles (APPs)* means the APPs contained in the Privacy Act.

This Privacy Policy is in addition to, and should be read in conjunction with BlueBet’s General Terms & Conditions, Racing Rules, Sports Rules and Product and Promotional Terms and Conditions. BlueBet will review this Privacy Policy periodically and reserves the right to modify parts of this policy at any time and at its discretion. Changes will be effected immediately when posted on the website and we recommend you review these pages periodically for any updates as your continued use of the website will constitute acceptance of the terms of this Privacy Policy.

This Privacy Policy sets out how BlueBet will manage your Personal Information (**PI**) which we collect as a result of your membership with BlueBet, your use of our websites, mobile sites and mobile applications including www.bluebet.com.au, and m.bluebet.com.au (“the website”). We are committed to ensuring that the PI we collect about you is protected and is used, stored and disclosed in accordance with the Privacy Act, the APPs and this Privacy Policy.

This Privacy Policy will not apply to websites which are linked to the website and over which BlueBet has no control.

Personal Information

For the purposes of this Privacy Policy, PI means information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

The types of PI BlueBet may collect from you include:

- Name
- Home address
- Date of Birth
- Gender
- Phone number
- Photographs or images
- Personally submitted preferences
- Bank account and credit card information
- Financial information
- Location data;
- IP address;
- Betting activities and behavioural data;
- Email address;
- Additional identity verification information.

Collection

You are welcome to browse our website without ever providing us with your PI. However, if you wish to deposit funds, place a bet and/or withdraw funds, you will, for legitimate reasons, be required to provide us with certain PI so that we are aware of whom we are communicating with.

BlueBet will only collect such PI as is required for the purpose of identifying you for your own security and maintaining your account in the reasonable operation of our business of a licensed online bookmaker. The PI we collect can be viewed in the My Details area of our website. If you do decide to provide us with PI, we will retain that PI. By choosing to provide PI on our website, you consent to our collecting and retaining that Personal Information.

Your PI will be collected in a lawful and fair way, and not in an unreasonably intrusive way.

BlueBet will collect your PI in order to comply with its legal and statutory obligations including in relation to customer identity verification and reporting obligations imposed by the *Anti-Money Laundering and Counter Terrorism Act 2006 (Cth) (AML/CTF Act)* and the *Northern Territory Racing Commission Racing and Betting Act 2011 (Racing and Betting Act)* licensing obligations.

We will also collect your PI in order to take appropriate action if BlueBet has reason to suspect that unlawful activity or misconduct of a serious nature has been, is being or may be engaged in that relates to our functions and activities, and to the extent that the information is included in a job application, to assess and process that application and for other recruitment purposes.

Use and Disclosure

When we collect PI on our website, we may use this information to:

- provide you with the services you have requested, or meet the purpose for which the information was submitted;
- upgrade, enhance and personalise your experience within the website, or tailor our information, services or products for you;
- contact you for direct marketing or other promotional purposes;
- create aggregate data about our clients, such as average age, gender, demographics and other statistics to allow for more - efficient operation of this website;
- determine your liability to Australian GST.

By choosing to provide PI on our website, you consent to our using your PI as set out above.

BlueBet does not give, sell, rent, share, or trade any PI regarding our Clients to third parties, except as set out below.

PI that you submit to our website may be disclosed to a third party:

- to enable BlueBet to perform its obligations to the Client under BlueBet's Terms;
- to enable BlueBet to ensure that the Client performs their obligations under BlueBet's Terms;
- to a credit reporting agency;
- to maintain a credit information file in relation to the Client;
- to carry out a credit assessment on the Client;
- for planning, research, promotion and marketing of our products and services;
- to BlueBet's contractors and external service providers associated with the operation of BlueBet's business and provision of its services, including, without limitation, associated data centres, web hosting providers, payment service providers, identification verification service

providers, advertising agencies, mailing houses, printers, call centres, market research analysts, IT consultants, professional advisors and consultants;

- to government and regulatory authorities and other organisations as required or authorised by law or otherwise permitted under the Privacy Act;
- to law enforcement agencies to assist in the prevention of criminal activities;
- to Australian racing/sports controlling bodies where such controlling bodies request information to protect and maintain the integrity of the racing/sports code or where we consider any betting activity to be suspicious or unusual; and
- to a successor entity in the event of a business transition, such as a merger, corporate reorganisation or to a purchaser of part of or all of BlueBet's assets
- if we have informed you of the particular third party to whom it will be disclosed, at the time of collection;
- in order to participate in activities with business partners and sponsors, who will be identified to you when the relevant Personal Information is collected;
- to the extent necessary to carry out the uses which are set out above;
- if the disclosure is required by law, permitted by the APPs, necessary to co-operate with a judicial process or a law enforcement agency, necessary to protect and defend the rights or property of BlueBet, this site, or participating sites, or necessary to lessen or prevent unlawful activity or serious threats to individuals, public health or safety;
- where you have consented to its disclosure either expressly or by the circumstances and your conduct.

Should the information be transferred to a third party, BlueBet will use reasonable endeavours to ensure that the information disclosed is protected by the third party under contractual arrangements and in accordance with the Privacy Act.

All BlueBet employees are subject to confidentiality agreements in respect of client's details and trading habits.

Direct marketing and opting out

From time to time we may use and disclose your personal information to inform you about BlueBet's (and its related bodies corporate) products or services or about promotional activities, which BlueBet believes, may be of interest or of benefit to you. We may do this via email, SMS, telephone or mail.

If you no longer wish to receive marketing or promotional material from BlueBet at all or in any particular form, you may alter your preference settings in the MY Details section of the website or contact us at any time by email to contact@bluebet.com.au with your request with which we will apply as soon as is practical. Where we send you commercial electronic messages for direct marketing purposes, each message will contain a functional means for you to opt-out of receiving such messages.

From time to time we may contact you in relation to the opening, service, management and administration of your BlueBet account. These communications can be via any of the modes of contact recorded when you apply or applied to open an account or update your contact preferences, registered as a member or which we (or our related bodies corporate) otherwise collect for the purposes of opening and maintaining an account. Such communication is not affected by your opt-in or opt-out status for direct marketing communications.

Cookies

Personal Information may also be collected by cookies when you use the website. Cookies are pieces of data stored by your web browser on your hard drive which contain information relating to your use of the website. When you access the website, cookies may record details relating to your use of the website, including what pages you view from the website. BlueBet does not use cookies to track your Personal Information and uses them for internal management purposes only.

We may use third-parties to serve ads on our website. These companies may employ cookies and action tags (also known as single pixel gifs or web beacons) to measure advertising effectiveness. Any information that these third parties collect via cookies and action tags is completely anonymous.

Data Security

You acknowledge that no data transmission over the internet is completely secure. Accordingly, BlueBet does not warrant the security of any information you transmit to it and any such transmitted information to BlueBet is done so at your own risk. Notwithstanding these risks, BlueBet will take reasonable steps to protect PI from misuse, loss, and unauthorised access, modification and disclosure.

Non-Personal Information

We may decide to use and disclose non-personal information relating to your account usage. For example, we may decide to disclose aggregate average data for statistical purposes to current or potential stakeholders in BlueBet or for determining future marketing plans or upgrades to our website. Apart from mandatory information we need to provide our services to you, there may be data that does not personally identify you collected to monitor and improve our service. For example, when a web page is visited the URL of the page is recorded together with the time and date and the browser software being used. Each time you log into your account on our website, our web server will issue you with a cookie to authenticate you as the account holder. Once you are logged into your account on our website, specific or aggregate information may be collected and logged for security purposes. For example, our server recognises your domain name, IP address and the pages that you visit. These logs may be used for the resolution of problems and disputes.

Access to Personal Information

We will take reasonable steps to ensure that the PI we collect is accurate, complete and up-to-date. The PI collected can be changed by entering the Edit Account Details in the Account section after logging on. Details of your transaction history can be found in the All Bets and Pending Bets areas of the website.

We may not be required to give you access to your PI in certain circumstances which are set out in the APPs, including where it may have an unreasonable impact on other individual's privacy. If we refuse access for such reasons, we will advise you in writing of the refusal, our reasons and the complaint mechanisms available to you.

Correction and Continuous Updating of your Personal Information

If you believe that the PI BlueBet holds about you is inaccurate, incomplete or not current, please let BlueBet know and we will correct it if we are satisfied that a correction is necessary.

BlueBet will take reasonable steps to destroy or permanently de-identify the PI we hold when it is no longer required for any purpose permitted under the APPs including our legal or operational obligations.

Consent

You consent to the use or disclosure of your PI in circumstances which are:

- set out in this Privacy Policy;
- clearly explained to you at the time when the information is collected from you;
- or permitted under the APPs.

Contact details

If you have any queries, requests for access or correction or complaints relating to the handling of your personal information, please contact the Privacy Officer, whose contact details are as follows:

Compliance Manager

BlueBet Pty Ltd

Tel: 1800 797 644

Email: contact@bluebet.com.au

Further Information about privacy concerns or complaints in Australia can be found on the Office of the Australian Privacy Commissioner's website at www.oaic.gov.au.

Disclaimer

BlueBet and this Privacy Policy may be subject to applicable legislation, regulations and codes of practice. To the extent that this policy exceeds the minimum obligations of BlueBet under the Commonwealth and Territory legislation, this policy serves as a documentation of our voluntarily self-imposed standards. While we are determined to meet those standards as best we can, to the extent permitted by law, BlueBet is not liable if it does not adhere to any of these voluntary self-imposed standards, for any loss, liability, costs, expense or damage arising as a result of BlueBet failing to meet any of the voluntarily self-imposed standards in this policy.