



PRIVACY POLICY

27 August 2024

This is the privacy policy (“**Privacy Policy**”) for BlueBet Pty Ltd (**ABN 42 607 521 835**) (“**Company**”), the owner of and licensee for the betr wagering platform. The Company 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 the terms and conditions and betting rules which apply to your relevant account(s) with the Company’s betting brands, betr (“Terms and Conditions”) .

The Company 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 affected 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 the Company will manage your Personal Information (**PI**) which we collect as a result of you holding an account with the Company, your use of our websites, mobile sites and mobile applications including www.betr.com.au and m.betr.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 the Company 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 the Company may collect from you include:

- Name
- Home address
- Date of Birth
- Gender
- Phone number
- Photographs or images
- Personally submitted preferences
- Bank account and card information
- Financial information including information about your financial circumstances and source of income or wealth
- Records of communications and dealings with you.

- Information we may collect as part of a survey, customer feedback request or a competition.
- Location data
- IP address
- Betting activities and behavioural data
- Email address
- Additional information obtained through verification procedures.

Collection of Personal Information

Personal information is collected in a number of ways, including:

- directly from you, for example, when you give it to us, when you enter your personal details on our websites or Apps, when you open an account or update your account details, when you place a bet with us, when you complete an entry form for a competition or participate in a survey, or when you apply to work for us.
- when you use our products or services, including from your use of our websites and Apps.
- when you email, text or telephone us, engage in live chat or when you share information with us from other social applications, services, websites or Apps.
- when you interact with our websites, Apps, online content and advertising.
- from publicly available sources of information, including third parties.
- from third parties, such as banks, regulators, payment channel providers or your family members.
- from background check providers, former employers, referees, and educational institutions, if you apply to work for us.
- through a purchase of a business or assets of a business.

If you choose not to provide us with information, we may be unable to supply products or services to you.

The Company 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 and Wagering Act 2024* (**Racing and Wagering Act**) licensing obligations.

We will also collect your PI in order to take appropriate action if the Company 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 of Personal Information

When we collect PI, we may use or disclose this information for the following purposes:

- 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.
- to identify and/or consider your eligibility for our products and services.

- 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.
- to ensure that you and your account with us complies with all relevant laws and your contractual obligations to us.
- determine your liability to Australian GST.
- for security purposes, including to perform functions that we believe are necessary to protect the security and proper functioning of our websites and Apps.
- to comply with our legal obligations, resolve disputes, and enforce agreements.
- to investigate or pursue a legal claim.
- to administer surveys, contests, or other promotional activities or events sponsored or managed by us or our business partners.
- to promote and market our products.
- to assist in the enforcement of laws.
- to report to our directors and shareholders.
- to maintain and update our records.
- to determine whether to hire you to work for us.
- as otherwise required or authorised by law.

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

Disclosure of Personal Information

We may disclose your PI to a third party in the following circumstances:

- to enable the Company to perform its obligations to its customers under the Company's Terms and Conditions.
- to enable the Company to ensure that its customers perform their obligations under the Company's Terms and Conditions.
- to a credit reporting agency.
- to maintain a credit information file in relation to a the Company customer.
- to carry out a credit assessment on a current or prospective customer.
- for planning, research, promotion and marketing of our products and services.
- to the Company's contractors and external service providers associated with the operation of the Company'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.
- to related bodies corporate.
- to a successor or other related entity in the event of a business transition, such as a merger, corporate reorganisation or to a purchaser of part of or all of the

Company's assets.

- if we have informed you of the third party to whom it will be disclosed, at the time of collection.
- to participate in activities with business partners and sponsors.
- 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 the Company, 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, the Company 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 the Company employees are required to maintain the confidentiality of customers' details and wagering habits.

Direct marketing and opting out

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

If you no longer wish to receive marketing or promotional material from the Company 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 telephone, LiveHelp or email to contact@betr.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 or unsubscribe from receiving such messages.

From time to time we may contact you in relation to the opening, service, management and administration of your the Company 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 customer 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. 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, the Company does not warrant the security of any information you transmit to it and any such transmitted information to the Company is done so at your own risk. Notwithstanding these risks, the Company will take reasonable steps to protect PI from misuse, loss, and unauthorised access, modification and disclosure.

We take seriously the responsibility to exclude children from access to our services. We will not accept their information for the purposes of opening a wagering account. It is however ultimately the responsibility of parents or guardians to monitor their children's Internet activities including where appropriate by using Internet screening software.

Remember to always log out of your account when you have completed your time on the website. This is particularly important if you share a computer with another person. You are responsible for the security of and access to your own computer, mobile device or any other handset used to access the website.

Ultimately, you are solely responsible for maintaining the secrecy of your username, password and any account information. Please be careful whenever using the Internet and our website.

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 the Company 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 My Details section after logging on. Details of your transaction history can be found in the My Bets area 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 the Company holds about you is inaccurate, incomplete or not current, please let the Company know and we will correct it if we are satisfied that a correction is necessary.

Updates to this Privacy Policy

The Company may review, change and update this Privacy Policy from time to time reflect our current practices and obligations. We will publish our current Privacy Policy on our website at www.betr.com.au and the changes will take effect at the time of publishing. You should review this Privacy Policy regularly and remain familiar with its terms.

The Company 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
compliance@betr.com.au

Tel: 1800 002 387

Email: contact@betrbet.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

The Company 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 the Company 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, the Company 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 the Company failing to meet any of the voluntarily self-imposed standards in this policy.