

GROUP PRIVACY POLICY

1 ABOUT THIS PRIVACY POLICY

1.1 Companies covered by this privacy policy

This privacy policy applies to Tabcorp Holdings Limited (ABN 66 063 780 709) and its subsidiaries that are incorporated in Australia or are otherwise subject to the *Privacy Act 1988* (Cth) (**Privacy Act**).

We refer to these entities as “Tabcorp”, “we”, “us” or “our” and the “Tabcorp Group”.

Tabcorp is bound by the Privacy Act and the Australian Privacy Principles (**APPs**).

1.2 Tabcorp's commitment to privacy compliance

Tabcorp seeks to implement practices, procedures and systems that promote compliance with the APPs (and any APP code applying to us) and allow us to deal with your enquiries and complaints concerning compliance with the APPs and any APP code applying to us.

You can contact our Privacy Officer to discuss any privacy related queries you may have - email privacy@tabcorp.com.au or telephone +61 3 9868 2890.

1.3 This privacy policy applies to personal information

This privacy policy applies to personal information. Under the Privacy Act, "personal information" is information or an opinion about an identified individual or an individual who is reasonably identifiable. Common examples include a customer's or job applicant's name, address, telephone number or date of birth.

1.4 Your agreement to this privacy policy

Please read this policy carefully to understand our practices regarding your personal information and how we will treat it. By using any Tabcorp website or product (including via any of our iPhone apps, iPad apps or Android apps or via phone), agreeing to the terms and conditions for any Tabcorp product or training account, providing services to Tabcorp, or otherwise providing your personal information to us, you confirm that you have read and agree to this privacy policy.

We will review this privacy policy periodically and may modify and update it at any time. Changes to this privacy policy will come into effect immediately upon such changes being uploaded on our websites (or our iPhone apps, iPad apps or Android apps). If applicable, your continued use of our products and services following such upload will constitute your acceptance of these changes.

1.5 Employee records exception

Where applicable, Tabcorp will rely on the "employee records exemption" in the Privacy Act and any other applicable exemptions in the Privacy Act or other relevant legislation. The employee records exemption means that in many cases, Tabcorp is not bound by the requirements of the Privacy Act in relation to personal information it holds about its current or former employees (relating to their employment).

2 KINDS OF INFORMATION WE COLLECT AND HOLD

The kind of information we collect and hold depends on your dealings with us and on the requirements of the laws, regulations, licence conditions and betting rules applying to us, for example laws such as the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) (**AML/CTF Act**).

This section provides examples of the kinds of information we may collect and hold about you. The lists below are not exhaustive.

2.1 Opening an account

To open and operate a Tabcorp account we need your:

- name;
- residential and email addresses;
- date of birth; and
- telephone number.

We may also ask for copies of documents confirming your identity, such as your:

- driver's licence;
- passport;
- birth certificate; and/or
- utility bills.

We may ask for other details from you, such as:

- your gender;
- your credit card or bank account details, which may include a photocopy or scanned image of the front and back of your credit card (to allow you withdraw or deposit funds into your account); and
- some lifestyle or betting frequency information.

If you apply to become a platinum or premium customer, or apply to receive access to TAB Studio, in addition to information provided to open a wagering account you will need to supply your wagering account number(s) (if applicable) and other details we may reasonably require.

If you open an account with us, or access or use your existing account, using your mobile device (e.g. a smart phone) while in one of our retail agencies or venues, you consent to Tabcorp collecting your personal information (including the fact that you are in that agency or venue at the time of opening your account or accessing or using your account) via your mobile device (**mobile device information**). Tabcorp may disclose your mobile device information to that retail venue for analytical purposes and direct marketing, as described in section 5.5.

2.2 Claiming prizes

If you win a prize, apply for an unclaimed prize or dispute a decision we make regarding a prize, promotion or competition, we may collect your personal information including your name, residential address and contact phone number.

2.3 Making website enquiries

If you send us an enquiry through one of our websites, we may collect your name, phone number and email address.

2.4 Working for Tabcorp

If you wish to be, or are, or have been, contracted, employed, or otherwise engaged by Tabcorp as part of its workforce (directly or indirectly, e.g. as an employee of a labour supply company), we may collect and hold personal information about you, which may include:

- name;
- residential and email addresses;
- telephone number;
- academic results and qualifications;
- expertise and experience;
- employment history;
- personal interests;
- current salary and salary expectations; and
- background information about you including, for example, your criminal record and whether you're a politically exposed or sanctioned person.

Tabcorp may use and disclose such information in accordance with this privacy policy.

In addition, Tabcorp may, search government records and publicly available sources, including social media and other internet sources, for background information about you. Tabcorp requires background information as part of its assurance program on the identity, honesty and integrity of prospective and current employees. Background checks may require Tabcorp to disclose information about you to certain regulators and other third parties.

2.5 Supplying goods or services to Tabcorp

If you're a supplier of goods or services to Tabcorp, or are employed or engaged by such a supplier, we may collect personal information about you, including:

- name;
- position;
- business and email addresses;
- telephone number; and
- background information about you including, for example, your criminal record and whether you're a politically exposed or sanctioned person.

Tabcorp may, for example, search government records and publicly available sources, including social media and other internet sources, for background information about you. Tabcorp requires background information as part of its supplier due diligence activities. Background checks may require Tabcorp to disclose information about you to certain regulators and other third parties.

2.6 Acquiring goods or services from Tabcorp

If you acquire goods or services from Tabcorp, or are employed or engaged by an entity which does, we may collect personal information about you, including:

- name;
- position;
- business and email addresses;

- telephone number; and
- background information about you, including, for example, your credit history, criminal record and whether you're a politically exposed or sanctioned person.

Tabcorp may, for example, search government records, credit listing agencies and publicly available sources, including social media and other internet sources, for background information about you. Tabcorp requires background information as part of its customer due diligence activities. Background checks may require Tabcorp to disclose information about you to certain regulators and other third parties.

2.7 Working in Tabcorp's retail network

If you're employed by one of Tabcorp's franchisees or agents, or another retailer in Tabcorp's retail network of agencies, venues and outlets, we may need you or your employer to provide us with records that include personal information about you, including:

- name;
- work and/or residential addresses;
- age;
- position;
- citizenship / migration / visa status;
- copies of pay slips;
- rosters;
- proof of payment of wages into bank accounts; and
- proof of superannuation payments.

Tabcorp may request this information to monitor your employer's compliance with relevant workplace laws included under the *Fair Work Act 2009* (Cth) on an ad hoc basis, and where we suspect there is, or may be, an area of non-compliance by your employer.

2.8 Participating in Tabcorp training programs

If you register or enrol to participate in a Tabcorp training program, we will collect personal information including your:

- name;
- residential and email addresses;
- date of birth; and
- telephone number.

We may ask for copies of documents confirming your identity, such as your:

- driver's licence;
- passport;
- birth certificate; and/or
- wagering account number with us, if you have one.

We may also ask for other details from you, such as:

- your gender;
- information about qualifications and other training you're undertaking or have completed;

- sensitive information, including citizenship, Aboriginal or Torres Strait Islander origin and any disability you may have (for the purpose of required reporting to relevant Commonwealth, state and territory government authorities and agencies); and/or
- your credit card details (if you need to pay directly for programs).

2.9 Information from other Tabcorp companies

We may collect your information from other companies in the Tabcorp Group (our related bodies corporate) such as:

- your name;
- your contact details;
- your date of birth;
- copies of identification documents;
- lifestyle or betting frequency information; and
- recordings of telephone calls you have made to our call centres.

2.10 Additional information we may collect for the AML/CTF Act

Under the AML/CTF Act we may have to:

- request further 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 report activity externally; and/or
- collect other information about you that we reasonably require to help assess your risk to our business under the AML/CTF Act, including sensitive information.

2.11 Video surveillance

For security reasons, we may collect video surveillance footage at certain Tabcorp premises for reasons including monitoring of gaming, prevention of theft and other illegal/undesirable activity, investigating patron disputes and coordination of emergency and alarm responses. This surveillance is carried out using visual surveillance devices on a continuous and ongoing basis by our surveillance/security/compliance teams (or third parties).

We may also collect video surveillance footage from our retail venues including those operated by third parties.

2.12 Information about your online behaviour

We may collect information regarding your online behaviour, including:

- your responses to correspondence, promotions, giveaways and competitions;
- the time, date and URL of each request for a page from our web server and other web servers assisting us (including the times that you log in to any account to help ensure the security of your account and to help verify that the person operating the account is you), plus information on the browser software being used to make the request;
- “click stream” information from your use of our websites (such as information about areas of our websites you’ve accessed and the time and date of access);

- Doubleclick ad serving information from your use of our websites (such as information about whether a marketing campaign has been effective);
- information about your preferences relating to the use of our websites; and
- information from your computer or device allowing us to: analyse trends, administer our websites, track your web navigation, and gather broad demographic information for aggregated use.

To do this, we may use cookies (pieces of data sent by a website to your computer and stored on the hard drive). Cookies allow a website to identify and interact with your computer. The information stored in cookies may be used to offer our products and services directly to you and customise and improve our websites. We don't use cookies to retrieve information that was not originally sent by us to you in a cookie.

You can set your browser to accept or reject all cookies, or notify you when a cookie is sent. If you reject cookies or delete our cookies, you may still use our websites, but may not have access to "account holder only" or other restricted areas.

3 HOW WE COLLECT PERSONAL INFORMATION

We generally collect your personal information directly from you via one of our websites, apps or via telephone, by mail or in person. However, we may collect information from a third party if it isn't reasonable or practical to collect it from you or if necessary to satisfy our legal obligations.

For example, we may collect your personal information from:

- third parties that can help assess your risk to our business under the AML/CTF Act;
- a referee nominated by you when you apply for a job with us;
- your employer if you're employed by a company that provides goods or services to us;
- your employer if you work in our retail network of agencies, venues or outlets;
- our related bodies corporate;
- our share registry provider;
- institutional investors (e.g. banks) that offer customers investment products incorporating Tabcorp shares;
- our retail venues;
- any entity that provides training consultancy services to us;
- public sources (e.g. social media sites, Google and other websites), e.g. for the purposes of our AML/CTF Act compliance program;
- if relevant, any state regulatory bodies to confirm whether you're a voluntarily self-excluded patron in Australia or any other country; and
- any relevant Commonwealth, state or territory government authority or agency.

All phone calls to Operator Assist, Touchtone, Speech Express and Tabcorp Customer Service are recorded for regulatory, verification and quality purposes.

4 WHY WE COLLECT AND HOLD PERSONAL INFORMATION

4.1 Reasons for collecting and holding your personal information

Our reasons for collecting and holding your personal information include:

- to identify you and verify your identity;
- to manage, administer, and control the quality of the products and services we provide to you;
- to market our products and services to you;
- to market the products and services of our related bodies corporate, and to enable our related bodies corporate and selected third party partners to market products and services to you;
- to operate self-exclusion, pre-commitment limit and bet exemption programs and comply with our other responsible gambling commitments;
- to administer and manage the ownership of Tabcorp shares (including entitlements to dividends, voting and title);
- to identify underlying beneficial owners of shares held by institutions (e.g. banks);
- to consider you for employment, if you apply for a position with us;
- to do business with our suppliers of goods and services (you may be a supplier, or employed or engaged by a supplier);
- to take reasonable steps to prevent a contravention of workplace laws by your employer if you work in our retail network of agencies, venues and outlets;
- to notify you if you have won a competition, promotion or prize;
- to carry out research and analysis related to our products and services;
- to develop and improve our products and services;
- to ensure the security of any account you may hold with Tabcorp;
- to maintain security at the venues we own and operate, and at the retail agencies and venues owned and operated by third parties under licence;
- to assist retail venues with the management of those venues;
- to identify your behaviour, habits and preferences;
- to assist you with enquiries or complaints;
- to assess whether you pose a risk to our business or the businesses of our related bodies corporate;
- to protect our rights and property and those of any Tabcorp customer;
- to maintain a register of individuals who have undertaken specific training programs provided by us; and
- any other purpose required or permitted by law.

Another reason for collecting and holding your personal information is to comply with our legal obligations. For example, we may be legally required to collect personal information under:

- the AML/CTF Act (and we may collect your personal information for the purpose of implementing our AML/CTF Act compliance program);
- the *Corporations Act 2001* (Cth);

- the ASX Listing Rules and Settlement Operating Rules;
- the conditions of licences applying to us;
- legislation and contractual obligations with the state controlling bodies (including thoroughbred, harness and greyhound) relevant to our State Race Fields Approvals; and
- legislation and contractual obligations with authorised sports controlling bodies (domestic and international).

We may also be required to collect personal information for the purpose of investigations by law enforcement agencies like the Australian Federal Police, the Australian Competition and Consumer Commission, the Australian Securities and Investments Commission and the Australian Crime Commission.

4.2 What happens if we don't collect your personal information?

Unfortunately, if we're unable to collect your personal information, we may not be able to provide our products and services to you and/or any account that you may hold may not perform properly. We may also be unable to issue or administer any Tabcorp shares you have applied for.

For example:

- if you don't provide the necessary identification documents when required, your account may be frozen and you will not be able to place bets or access your funds until we have verified your identity;
- if you refuse or are unable to provide further information we're required to collect under the AML/CTF Act, we may freeze your account until you provide the additional information;
- if you don't provide sufficient information about your identity, qualifications and experience we may not be able to consider you for employment or engagement with us; and
- if you hold Tabcorp shares and don't provide relevant personal information:
 - we may not be able to pay you dividends;
 - we may not be able to send you important shareholder communications, such as proxy forms or annual reports; and
 - you may not be able to vote on resolutions at our annual general meetings.

5 HOW WE USE AND DISCLOSE PERSONAL INFORMATION

Information about how we use and disclose personal information is below.

This list is not intended to be exhaustive and there may be other third parties to which we give your personal information (for example, professional advisors or insurers) where required or permitted by law.

5.1 Our employees and contractors

We may disclose personal information to our employees and contractors, but only as needed to perform their jobs or provide their services (they have obligations to treat the personal information they access as confidential).

5.2 Public relations

If you win a major prize, we may give your details to external publicity businesses for reasonable promotional activities. We will ask for your consent before we do this, and you can choose not to have your name disclosed in this way.

5.3 Service providers

We may disclose personal information to organisations that assist us to:

- check your name against government or other watch lists (e.g. if you're the subject of economic sanctions imposed by the government);
- provide, manage and administer our products and services, our business and our business systems (including mailing houses, our share registry provider, printers, public relations and advertising agencies, postal services, call centres, product development consultants, providers of customer relationship management (CRM) and affiliate management services, auditors, lawyers, providers of fraud detection services, IT technicians and software providers, IT consultants, website developers, providers of services to support our training programs, providers of payment processing services, data centre providers and providers of technology platforms such as TAB Active);
- develop and market our products and services (including market research analysts);
- assess risks under the AML/CTF Act;
- manage Tabcorp loyalty programs (including updating points balances, identifying any free, bonus or promotional points owing to members, and sending members information);
- comply with industry standards (such as the Payment Card Industry Data Security Standard), and securely manage processing of your credit card payments and storage of your credit card details;
- analyse trends and aggregated demographic information, and target your interests; and
- inspect, cleanse, transform and model such personal information for the purpose of discovering useful information, informing conclusions, and supporting decision making within Tabcorp, whether or not you are a current supplier, customer, employee or contractor.

5.4 Regulators/industry bodies

We may disclose your personal information to:

- regulators and law enforcement agencies (including those responsible for enforcing the AML/CTF Act);
- respond to an enquiry from a government agency under state, territory or Commonwealth laws;
- state racing controlling bodies (including thoroughbred, harness and greyhound) under our state race fields approvals and our contracts with those bodies;
- authorised sports controlling bodies (domestic and international) – including, for example, information relating to your betting on the sport controlled by that body or on any other sport, event or thing;

- other organisations that coordinate a sport or racing code or are responsible for the integrity or regulation of a sport or racing code; and
- any other relevant Commonwealth, State and Territory government authorities and agencies.

5.5 Our retail venues

We may disclose your personal information to our retail venues (including their owners, managers, operators and staff) for purposes including allowing them to:

- be informed that you have excluded yourself from a particular retail agency or venue;
- review and improve their products and services;
- help them identify new products and services;
- perform statistical analysis;
- keep informed about training you have enrolled for or undertaken with us;
- help us to comply with our AML/CTF Act compliance program;
- help them to comply with their legal obligations; and
- otherwise help us to manage our relationships with our retail venues.

Tabcorp may also disclose your mobile device information to the owner/manager/operator/staff of the retail venue where you are when you open your account with us, or where you are when you access or use your existing account, for use in direct marketing to you (including via electronic messaging such as email or SMS).

Our retail venues may have their own privacy policies which explain how the agency/venue will collect, store, use and disclose your personal information.

5.6 Related corporations

We may disclose personal information to our related bodies corporate:

- so they can comply with their obligations under laws, regulations, licence conditions and betting rules;
- for legitimate employment-related purposes (as determined reasonably by us);
- so they can send you marketing information directly (see section 5.9); and
- as otherwise required or permitted by law.

5.7 Loyalty partners

If you join a Tabcorp loyalty program, we may disclose your personal information to business partners outside the Tabcorp group (e.g. racing clubs and sports controlling bodies across Australia) and from time to time other third parties, so they can send you promotional offers and information about their products and services.

5.8 Using credit reporting bodies to verify your identity

By agreeing to this Privacy Policy, you consent to us disclosing your name, residential address and date of birth to credit reporting bodies and asking the credit reporting bodies to assess whether the information we provide to them matches the information they hold about you in their credit information files. We do this to help us to verify your identity, if we are required to do so for the purposes of the AML/CTF Act.

The credit reporting bodies may use the names, residential addresses and dates of birth contained in credit information files relating to you and other people to prepare the assessment, which they will then provide to us. If we can't verify your identity using the assessment provided from the credit reporting bodies, we'll notify you.

If you don't want to have your identity verified by a credit reporting body, you must contact Tabcorp's wagering customer service team on 131 802, or your relevant Tabcorp business contact, and we can discuss other options with you.

5.9 Marketing

We may use and disclose your personal information for marketing purposes, including to:

- identify your betting and other behaviours, habits and preferences;
- let you know about upcoming events, training programs, promotions, offers and new products/services or other opportunities, via direct mail, email, SMS, MMS and/or phone calls (or any other means of marketing communication);
- communicate with you as a member of a loyalty program to:
 - inform you of marketing and promotional offers; and
 - notify you of points earned (including free, bonus and promotional points), via email, SMS, MMS, phone calls, direct mail or other means of communication from us and/or our loyalty partners;
- send you product and service information on behalf of third parties; and
- enable our related bodies corporate and selected third party partners to provide you product and service information directly.

When signing up for an account with us, we ask for your consent before sending you marketing communications. Each time you're sent a marketing communication, you'll be able to opt-out from future marketing communications.

You can also opt-out from future marketing communications at any time (email: privacy@tabcorp.com.au). We will promptly action any opt-out request.

If you consent to receiving marketing communications from Tabcorp, you also consent to receiving marketing material from our third-party partners, but you may withdraw that consent at any time. To withdraw your consent, follow the instructions in the advertising material or on the third party's website or email: privacy@tabcorp.com.au.

5.10 Replacement providers

If we:

- transfer responsibility for providing a Tabcorp product or service to another business; or
- stop providing a Tabcorp product or service (or limit it), and another business continues to offer a similar product/service,

we may disclose personal information to the other business so the product or service can continue to be provided to you or the other business can offer you a similar product or service. By agreeing to the terms and conditions for your Tabcorp account(s) (product or training account(s)) you consent to this disclosure, but you may withdraw that consent at any time - email: privacy@tabcorp.com.au.

5.11 Monitoring of betting accounts, including emails

Under the AML/CTF Act we may monitor transactions on your account(s), including emails you send to us.

We may use and disclose information collated during monitoring, including by releasing your personal information to government authorities, to sporting bodies, to bookmakers and to other betting and gambling operators. We won't tell you when we monitor your transactions or if we disclose any personal information obtained.

5.12 Monitoring phone calls

We record various types of telephone calls – see section 3 above.

We may disclose the details of your calls with us to enforcement agencies, regulators and external advisors. We won't notify you of those disclosures.

If you'd like to request a copy of your recorded telephone calls, please make a request under section 7.1 below.

5.13 Audit, market research and training

We may use and disclose your personal information for audit, market research and internal training purposes.

5.14 Protection of people and our rights and property

We may use and disclose your personal information where we reasonably believe it's necessary to protect any person or our rights or property.

6 SECURITY OF PERSONAL INFORMATION

Tabcorp takes reasonable precautions to protect the personal information it holds from:

- misuse, interference and loss; and
- unauthorised access, modification or disclosure.

These may include, for example, the protection of passwords using industry standard encryption; measures to preserve system security and restrict unauthorised access; and back-up systems to reduce the risk of accidental or malicious loss of data. We may use third party providers to store personal information electronically; we take reasonable steps to ensure this information is held securely.

Unfortunately, there's always risk involved in sending information through any channel over the internet. You send information over the internet entirely at your own risk.

7 HOW CAN I ACCESS AND CORRECT MY PERSONAL INFORMATION?

We will take reasonable steps to ensure the personal information we collect about you or that we use or disclose is accurate, up-to-date and complete. Please let us know if there's a change to any of the details you have given to us.

7.1 Access

You have a right to ask for access to the personal information we hold about you. Please contact the Privacy Officer at:

Level 21, Tower 2, 727 Collins Street, Docklands, VIC 3008

Telephone: +61 3 9868 2890 or email: privacy@tabcorp.com.au

Your personal information will usually be available within 30 days of your request. If there's a fee for accessing your personal information, we'll confirm the amount before providing the information.

In some circumstances we may decline to grant you access to your personal information, for example, if the release of your personal information would have an unreasonable impact on the privacy of others. Please see the APPs for further information.

We may require evidence of your identity as part of the process of providing you with access to your personal information.

7.2 Corrections

You have a right to ask us to correct the personal information we hold about you. Please contact the Privacy Officer at:

Level 21, Tower 2, 727 Collins Street, Docklands, VIC 3008

Telephone: +61 3 9868 2890 or email: privacy@tabcorp.com.au

It's not always possible to remove or modify information in our databases, but we'll take reasonable steps to correct your personal information to ensure that it's accurate, up-to-date, complete, relevant and not misleading.

If we decline to make your requested correction, you may request us to attach to your personal information a statement that it is inaccurate, out-of-date, incomplete, irrelevant or misleading. We will take reasonable steps to do this.

If we disclosed your personal information to a third party before correcting it, you may request us to notify the third party of the correction we've made. We will take reasonable steps to do so unless this would be impractical or unlawful.

We won't charge you to request a correction, for making a correction or for attaching a statement to a record.

8 MAKING COMPLAINTS

If you have a concern about how we've handled your personal information, please let us know so we can address the problem. You can contact the Privacy Officer at:

Level 21, Tower 2, 727 Collins Street, Docklands, VIC 3008

Telephone: +61 3 9868 2890 or email: privacy@tabcorp.com.au

To lodge a formal complaint, please send details to the Privacy Officer in writing. We'll attempt to respond within a reasonable time, usually 30 days. Tabcorp treats all privacy complaints seriously and any complaint will be assessed by our Privacy Officer with the aim of resolving the issue in a timely and efficient manner. We request that you cooperate with us during this process and provide us with any relevant information that we may need to investigate the complaint.

If your complaint is not resolved by our Privacy Officer, you can refer it to the Office of the Australian Information Commissioner. The contact details are:

Office of the Australian Information Commissioner
GPO Box 2999
Canberra ACT 2601

Australia
Phone: 1300 363 992
Fax: 02 9284 9666
Website: www.oaic.gov.au

9 DISCLOSURE OF PERSONAL INFORMATION OVERSEAS

We may disclose your personal information to recipients located outside Australia that provide services to us. For example, we may disclose your personal information to third parties in the United States of America, United Kingdom, Japan, Ireland and India, who provide customer relationship management services, identification and fraud detection services, cloud and data storage services, IT support services and other third party services to us.

However, we only disclose personal information to an overseas recipient if:

- we've taken reasonable steps to ensure that recipient does not breach the APPs (other than APP 1);
- we reasonably believe that:
 - a law or scheme in the country of the recipient includes requirements that are substantially similar to the requirements of the APPs; and
 - you can take action to enforce that law or scheme; or
- the APPs otherwise allow it.

10 SENSITIVE INFORMATION

We won't collect sensitive information, such as your:

- racial or ethnic origins;
- political opinions;
- religious or philosophical beliefs;
- sexual orientation or practices;
- criminal record; or
- health information

unless it's:

- given with your consent and it is reasonably necessary for one of our functions or activities. Without limitation, you consent to us collecting and using sensitive information about you where we need it:
 - in relation to you working with (or applying to work with) Tabcorp, e.g. health information relating to a disability that needs to be accommodated in the workplace;
 - to manage your self-exclusion or voluntary pre-commitment limit, or to remove you from a self-exclusion program (which generally requires a copy of a report from a registered gambling counsellor or voluntary pre-commitment election);
 - to provide certain training programs or services effectively to you; or
 - to enact special features on your Tabcorp account(s), e.g. minimum bet exemptions;

- otherwise for a purpose identified in this privacy policy; or
- required or authorised by law.

By agreeing to this Privacy Policy, you consent to us collecting sensitive information about you where required under the AML/CTF Act (for example, to verify your identity), and we may collect this information from third parties. The information will be stored in an AML/CTF risk register that we take reasonable steps to keep secure, and you may not have access to it. You won't be informed that we have collected the sensitive information.

If we consider that you pose a high risk to our business, we may disclose sensitive information about you to government authorities and may use the sensitive information as grounds to stop providing our services to you. We may freeze your account without warning and without telling you we are relying on sensitive information to do so.

11 HOW LONG CAN TABCORP KEEP MY PERSONAL INFORMATION?

If Tabcorp:

- no longer needs to use or disclose your personal information for any purpose that's authorised under the APPs, this privacy policy, or otherwise in writing; and
- is not legally required to retain that information,

then it will take reasonable steps to destroy the personal information or ensure it is de-identified.

Current from	26 August 2019
Replaces version dated	22 December 2017
Approved by	Managing Director & Chief Executive Officer