

BetM PRIVACY POLICY

1. Overview

- 1.1 This is the privacy policy ("**Privacy Policy**") of MGB Australia Pty Ltd (ACN 645 330 230), trading as BETM ("**BETM**", "**us**", "**we**", "**our**"). BETM takes its obligations under the *Privacy Act 1988* (Cth) ("**Privacy Act**") seriously. In this Privacy Policy, any reference to any of the Australian Privacy Principles ("**APP**" and "**APPs**") is a reference to the APPs contained in the Privacy Act.
- 1.2 This Privacy Policy sets out how we will manage your Personal Information ("**PI**") which we collect as a result of your membership with BETM, your use of the BETM website ("**Website**") or app ("**App**") or whenever we otherwise deal with you. 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 and this Privacy Policy.
- 1.3 By using the Website or App, becoming a member of BETM (**Member**), providing services to us or otherwise providing us with your PI, you consent to us collecting, using and disclosing your PI for the purposes set out, and otherwise in accordance with, this Privacy Policy.
- 1.4 If you disagree with our collection, use or disclosure of your PI, please do not create an Account with BETM, use our Website or App, provide services to us or otherwise provide us with your PI.
- 1.5 This Privacy Policy will not apply to third-party websites or apps which are linked to the Website or App and over which we have no control. We strongly recommend reviewing the relevant third-party privacy policy before using any linked website or app.
- 1.6 We may review, change and update this Privacy Policy at any time to reflect any current practices and obligations. We will publish our current Privacy Policy on our Website and App, with the changes taking effect at the time of publishing. We recommend that you review this Privacy Policy regularly and remain familiar with its terms. Your continued use of our products and services will constitute your acceptance of those changes.
- 1.7 For a copy of our current Privacy Policy, please visit <https://betm.com.au/privacy-policy>, or contact us at support@betm.com.au or 1300 002 386.

2. Personal Information

- 2.1 The kinds of PI that we collect from you depend on the nature of your dealings with us.
- 2.2 For example, on your registration to become a Member, we may collect your:
 - (a) name;

- (b) residential address;
- (c) date of birth;
- (d) gender identity;
- (e) email address;
- (f) phone number;
- (g) personally submitted preferences and service usage information;
- (h) bank account and credit card information;
- (i) location data;
- (j) IP address;
- (k) betting activities and behavioural data; and
- (l) other identity verification information (e.g., licence and/or passport details).

2.3 If you apply to be, are or have been employed or engaged as one of our employees or contractors, directly or indirectly, the PI we may collect from you includes:

- (a) name;
- (b) address(es) and other contact details;
- (c) academic and professional background and qualifications, expertise and experience;
- (d) employment history;
- (e) salary information; and
- (f) other background and identity verification information (e.g., criminal record, licence and/or passport details, migration visa details, whether you're a politically exposed person).

3. Collection Purposes

3.1 We collect your PI for the following purposes:

- (a) to send you newsletters and other communications that you ask to receive from us or that relate to the services we provide to you;
- (b) to process your application to become a Member;

- (c) to operate your Member betting account (“**Account**”) and to provide services to you as a Member;
- (d) for market and business analysis and research, in which case your information will be de-identified as far as is reasonably possible for the legitimate purposes of our analysis;
- (e) to improve and develop new products and services and to tailor our services to suit your needs;
- (f) to determine Members' liability to pay goods and services tax and other taxes where applicable;
- (g) to comply with our legal and statutory obligations including to verify your identity as required by the *Anti-Money Laundering and Counter Terrorism Financing Act 2006* (Cth) (“**AML/CTF Act**”);
- (h) for taking appropriate action if we have 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;
- (i) to comply with our responsible gambling commitments (for example, to implement any self-exclusion or other exemption programs);
- (j) to respond to enquiries and complaints from you and to establish, exercise or defend any legal claims;
- (k) to consider you for employment or engagement as a contractor and for other recruitment and employment / labour management purposes;
- (l) In relation to any investigations by law enforcement agencies such as the Australian Securities and Investments Commission or the Australian Federal Police; and
- (m) any other purpose required or permitted by law.

3.2 You may choose to deal with us on an anonymous basis or to use a pseudonym unless it is not practicable for us to deal with individuals whom we cannot identify, or we are required by law to only deal with identified individuals (such as under the AML/CTF Act). If you do not provide us with the PI we request, we may be unable to process your application to become a Member, allow you access to BETM as a Member, (e.g., if we are unable to verify your identity), consider you for employment or respond to your enquiry or complaint.

4. Cookies

- 4.1 PI may also be collected by cookies when you use the BETM Website. Cookies are pieces of data stored by your web browser on your hard drive that 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 don't use cookies to track your PI and use them for internal management purposes only, including to refine and improve user experience, improve service contents and operations and to meet regulatory requirements.
- 4.2 We may use third parties to place advertisements on the Website or App. These companies may employ cookies and action tags (also known as single-pixel gifs or web beacons) to measure advertising effectiveness. We ensure that any third parties placing advertisements on our Website or App are only those who keep any information collected via cookies and action tags completely anonymous.

5. Direct Marketing and Opting Out

- 5.1 On occasion, we may use and disclose your personal information to inform you about our products or services, or about promotional BETM offerings or activities, which we believe may be of interest or of benefit to you. We may do this via email, SMS, telephone, mail or notification on your mobile device.
- 5.2 If you no longer wish to receive marketing or promotional material from us at all or in any particular form, you may contact us at any time by email at support@betm.com.au or by phone at 1300 002 386 with your request, which we will comply with as soon as is most practical. Alternatively, or in addition to this option, 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.
- 5.3 On occasion, we may also contact you in relation to the opening, service, management and administration of your BETM account. These communications can be via any of the modes of contact recorded when you apply or applied to open your Account or update your contact preferences, when you 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.

6. Management of your Personal Information

- 6.1 We will take all reasonable steps to ensure that the PI we collect, use or disclose is correct and is stored in a secure environment that is accessed only by authorised persons.
- 6.2 The PI we collect is transferred and held via third-party operated data storage systems. All storage systems are subject to strict standards of maintenance (including regular auditing) security and compliance.

- 6.3 We will 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.

7. Disclosure

- 7.1 PI collected by us may be disclosed to a third party in the following circumstances:

- (a) to provide you with the services or support/information you have requested;
- (b) to service providers and professional advisers for the purposes of providing services to us (e.g., auditors, lawyers, IT consultants, third parties who assist us to comply with our identity verification and background check obligations);
- (c) to our sponsors and business partners strictly for the purposes of our business relationship with them;
- (d) where the disclosure is required or authorised by law, such as when requested as part of a criminal or government/regulatory investigation or required as part of a dispute resolution process;
- (e) to protect and maintain the integrity of particular sports and racing codes by assisting Australian and international sports and racing codes, controlling bodies or other related authorities in their inquiries or notifying such codes, bodies or authorities of any betting activity we consider to be unusual or suspicious;
- (f) to related bodies corporate and to related companies outside Australia including our parent company based in Tokyo, Japan, for management, governance, administration and related purposes;
- (g) to actual or prospective purchasers of all or a part of our business, and their advisers;
- (h) where you have consented to its disclosure either expressly or by the circumstances and your conduct; and
- (i) where requested from a government-affiliated health department or similar department for the purpose of studies, such as identifying gambling trends and harm minimisation, with this information being strictly de-identified.

- 7.2 We will take reasonable steps to ensure that any PI we disclose to a third party is protected by that party in accordance with the Privacy Act .

8. Security of Personal Information

- 8.1 No data transmission over the Internet is entirely secure. Accordingly, we do not warrant the security of any information you transmit to us. Any information you transmit to us is transmitted at your own risk. Once we receive your transmission, we will take all reasonable steps to protect your PI from misuse, loss and unauthorised access, modification and disclosure including by using password protected systems and storage systems as described in **Clause 6.2** above.
- 8.2 Our employees, agents and contractors are only provided with PI of our Members as needed to perform their roles, and they are required to maintain the confidentiality of this information.
- 8.3 Information posted on bulletin boards or communicated within a social media environment (e.g, Facebook, Twitter, Instagram, Reddit, WhatsApp and general chat rooms) and the chat room spaces on the BETM Website and App becomes public information, including within private direct messaging. We cannot guarantee the security of this type of disclosed information.
- 8.4 We take very seriously the responsibility to exclude minors (persons under the age of 18) from access to our services. We will not accept their information for the purposes of opening an 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 such as Cyber Patrol or Net Nanny.
- 8.5 We strongly recommend that you always log out of your Account when you have completed your time on the Website or App. This is particularly important if you share a computer or mobile device with another person. You acknowledge that you are responsible for the security of and access to your own computer, mobile device or any other device used to access the Website or App.
- 8.6 You further acknowledge that ultimately you are solely responsible for maintaining the secrecy of your username, password and any Account information. Please be careful whenever using our Website or App and when using the Internet generally.

9. Access to Personal Information

- 9.1 You may access the PI we collect about you by contacting us at support@betm.com.au or 1300 002 386, or by following the "**My Account**" section of the Website and App. We will give you access to your PI in the manner requested if possible and within a reasonable period. If we refuse your request or cannot give you access in the manner you have requested, we will do whatever is practicable to meet your requirements by other means.
- 9.2 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 individuals' privacy. If we refuse access for such reasons, we will advise you in writing of the refusal and our reasons, along with the complaint mechanisms available to you.

10. Correction and Continuous Updating of your Personal Information

- 10.1 We take reasonable measures to ensure that PI we collect is accurate, complete and current, and that when we use and disclose it, it is relevant, having regard to the purpose for which it is being used or disclosed. We will take reasonable measures to correct PI if we are satisfied that it should be corrected and we may contact you on a periodic basis to seek the most current information from you.
- 10.2 If you believe the PI we hold about you is inaccurate, incomplete or outdated, please notify us by email at support@betm.com.au or 1300 002 386 and we will correct it if we are satisfied that a correction is required. You may also update or correct your PI yourself in the "**My Account**" section of the Website and App. Details of your betting transactions can be also found in the "**History**" section under the "My Account" section of the Website and App.

11. Contact Details of Risk and Compliance Officer

- 11.1 If you have any queries, requests for access or correction, or complaints relating to the handling of your PI which has not been or you feel cannot be appropriately handled by Customer Service, please contact our Risk and Compliance Officer, whose details are as follows:

Shaun Beirne

MGB Australia Pty Ltd

Level 2, 3 Newton Street

Cremorne Vic 3121

Tel: (03) 8351 3219

Email: support@betm.com.au

- 11.2 Further information about privacy concerns or complaints in Australia may be found on the Office of the Australian Privacy Commissioner's (OAIC) website at www.oaic.gov.au.

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