

# PEGASUS LEISURE GROUP PRIVACY POLICY



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The protection of personal information is important to the Victoria Amateur Turf Club (incorporating the Melbourne Racing Club) (Club) and the Pegasus Leisure Group. Any reference to the Club in this Policy includes its subsidiaries. This policy applies to the collection, use and disclosure of personal information by or at any of the Club's racecourses, hotels or club venues.

The Club is committed to respecting the right to privacy and the protection of personal information.

This document sets out how the Club may collect, hold and use personal information. By providing your personal information to the Club, you consent to its use, storage and disclosure in accordance with this Privacy Policy.

## **What personal and sensitive information does the Club collect?**

### *Personal Information*

Personal information is information or an opinion (including information or an opinion forming part of a database) from which it is possible to determine someone's identity.

The information collected by the Club about a particular person will vary depending on the circumstances of collection. It may include, but is not limited to, a person's contact details (name, email and/or postal address, phone number), date of birth, gender, credit card details, driver's licence number, passport number, insurance details, employment history, qualifications or communication history with the Club.

The Club may take (or may arrange another person to take) photographs and electronic images of you whilst at any Club venue. By attending a Club venue, you acknowledge and agree that such photographs and other images are owned by the Club and the Club may use them for promotional or other purposes without your further consent being necessary.

### *Sensitive Information*

Sensitive information is a type of personal information that also includes information or an opinion about someone's:

- racial or ethnic origin;
- political opinions;
- membership of a political association, professional or trade association or trade union;
- religious beliefs or affiliations or philosophical beliefs;
- sexual preferences or practices;
- criminal record; or
- health, genetic information or disability.

If it is reasonably necessary in the circumstances, the Club may also collect sensitive information such as a person's medical history, nationality, their ethnic background or disabilities.

The Club is required by law to obtain consent when collecting sensitive information. The Club will assume consent to the collection of all sensitive information that is provided to it for use in accordance with this Privacy Policy, unless told otherwise.



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## How does the Club collect personal and sensitive information?

Information may be collected when you:

- (a) become a member of the Club;
- (b) enter any Club venues;
- (c) subscribe to any publication of the Club, including electronic publications;
- (d) provide details to the Club in an application, consent form, survey, feedback form or incident report;
- (e) become a member of any rewards or loyalty program either operated by the Club or by a third party on behalf of the Club;
- (f) enter personal information into, or agree to having your personal information entered into, one of the Club's online systems;
- (g) access the Club's or any of the venues' websites;
- (h) contact the Club via email, telephone, fax or mail or engage with the Club via social media;
- (i) participate in any program, activity, competition or event run by the Club;
- (j) enter into any marketing promotion or competition run by the Club;
- (k) join an international tour of a horse race or other event or seek information in relation to a tour;
- (l) purchase, redeem or claim tickets to horseracing or any other event organised by the Club or an authorised agent;
- (m) purchase, redeem or claim merchandise, products or services from the Club or an authorised agent or licensee;
- (n) make an enquiry regarding a dining, marquee, corporate or hospitality package or other function or event held at a Club venue;
- (o) are elected or appointed to the Executive Committee or a sub-committee of the Club;
- (p) apply for employment or a volunteer position with the Club;
- (q) apply for media accreditation with the Club;
- (r) seek information about Caulfield Village; or
- (s) where the Club is required to do so by law (for education, child protection, work health and safety laws, charitable collections, medical treatment or other legislation in Australia).

## *Providing information*

Depending on the circumstances, some types of information will be required and others might be optional. If you do not provide some or all of the information requested, this may affect the Club's ability to communicate with you or provide the requested products or services.

By not providing requested information, you may jeopardise your ability to participate in programs or services or otherwise interact with the Club. If it is impracticable for the Club to deal with you as a result of you not providing the requested information or consent, the Club may refuse to do so.

## *Collection from third parties*

The Club may collect personal information regarding a child from the parent or other responsible person associated with that child.

In many circumstances, the Club collects information from other third parties. Examples of such third parties could include, without limitation, Racing Victoria Limited, Tabcorp Gaming Solutions (for the purposes of a reward or loyalty program), government and law enforcement bodies.



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## *Information storage and protection*

The Club stores information in different ways, including in paper and electronic form.

The information we collect from and about our members is added to the Club's membership database. When your information is entered into the Club's membership database, the information may be combined or linked with other information held about you. We collect information from members via both paper and electronic application forms.

Information obtained from non-members in relation to race club activities is added to the Club's general database. This information may be combined or linked with other information held about you.

Information obtained at our venues is added to the Pegasus Leisure Group's database and/or the respective venue's database. Additionally information provided by patrons for the Diamond Rewards Program is collected by the Club and provided to Tabcorp Gaming Solutions who operate the rewards program.

Security of personal information is important to the Club. The Club has taken steps to protect the information we hold from misuse, loss, unauthorised access, modification or disclosure. Some of the security measures the Club uses includes strict confidentiality requirements of our employees, volunteers and service providers, security measures for system access and security measures for our various websites.

## **How does the Club use and disclose personal and sensitive information?**

### *Use*

The Club, and third parties to whom we may disclose personal information in accordance with this Privacy Policy, may use your personal information to:

- (a) verify your identity;
- (b) complete background checks;
- (c) provide racing related services to you as a spectator and patron;
- (d) provide member and venue-related benefits to you;
- (e) research, develop, run, administer and market programs, activities, ticketing opportunities, competitions and other events relating to the Club's activities;
- (f) research, develop and market products, services, merchandise and special offers made available by us and third parties (see "Direct Marketing" below);
- (g) respond to emergency situations involving or requiring medical treatment;
- (h) administer, manage and provide you with access to the Club's websites;
- (i) keep you informed of news and information relating to various Club events, activities and opportunities via various mediums.

### *Disclosure*

The Club may disclose your personal information to a range of organisations which include, but are not limited to:

- (a) other organisations involved in horseracing programs in Australia;
- (b) companies we engage to carry out functions and activities on the Club's behalf, including direct marketing (see "Direct Marketing" below);



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- (c) companies (such as Tabcorp Gaming Solutions) we engage to operate rewards/loyalty programs for the Club;
- (d) our professional advisers, including our accountants, auditors and lawyers;
- (e) our insurers;
- (f) the Victorian Commission for Gambling & Liquor Regulation;
- (g) the Office of the Racing Integrity Commission;
- (h) relevant sporting bodies such as Racing Victoria Limited, Federal and State Departments of Sport amongst others; and
- (i) in other circumstances permitted by law (see “Other Disclosures” below).

In some circumstances, personal information may also be disclosed outside of Australia - for example the Club’s membership database is kept on servers located in Canada. In such circumstances, the Club will use its best endeavours to ensure such parties are subject to a law, binding scheme or contract which effectively upholds principles for fair handling of the information that are suitably similar to the Australian Privacy Principles.

### *Direct marketing*

We will assume consent to use non-sensitive personal information to provide better services and for marketing purposes (including disclosure of such information to service providers).

Every person whose data is collected by the Club has the option to refuse e-mail, SMS or posted offers by making a request in writing to the Club’s Privacy Officer via the contact details set out below or by making use of the opt-out procedures included in any communications from us (however, information relating to the option to unsubscribe from those communications may be retained).

### *Other disclosures*

In addition, the Club may also disclose personal information:

- (a) with your express or implied consent;
- (b) when required or authorised by law;
- (c) to an enforcement body when reasonably necessary; or
- (d) to lessen or prevent a threat to an individual or public health or safety.

### *The Club’s websites*

When users visit the Club’s websites, our systems may record certain information about their use of the sites, including the web pages visited and the time and date of their visit. The Club uses this information to help analyse and improve the performance of the Club’s websites.

In addition we may use “cookies” on the Club’s websites. Cookies are small text files that help a website to remember the preferences of users to improve the experience of using that website. In some cases, the cookies that we use may collect some personal information. The Club will treat this information in the same way as other personal information we collect. You are free to disable cookies on your internet browser to prevent this information being collected; however, you will lose the benefit of the enhanced website experience that the use of cookies may offer.

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Websites linked to the Club's websites are not subject to the Club's privacy standards, policies or procedures. The Club cannot take any responsibility for the collection, use, disclosure or security of any personal information that you provide to a third party website.

## **Accessing and seeking correction of information held by the Club**

The Club will take all reasonable steps to ensure that the personal information it collects, uses or discloses is accurate, complete and up-to-date. However, we rely on the accuracy of personal information as provided to us both directly and indirectly.

We encourage all users to regularly review and update their personal information. If you would like to access personal information that we hold about you, we require you to put your request in writing. If we do not allow you access to any part of the personal information we hold about you, we will tell you why.

Individuals may also request access to their personal information held by us by making a request via the contact details set out below. We will respond to your request for access within 14 days and endeavour to provide the requested information within 30 days. If you find that the personal information we hold about you is inaccurate, incomplete or out-of-date, please contact us immediately and we will see that it is corrected.

## **Resolving privacy issues and complaints**

Any issues or complaints in relation to the collection, use, disclosure, quality, security of and access to your personal information may be made to the Club Privacy Officer at this address:

Chris Raven  
Legal Counsel  
Melbourne Racing Club  
PO Box 231  
CAULFIELD EAST VIC 3145  
Email: [craven@mrc.net.au](mailto:craven@mrc.net.au)  
Phone: (03) 9257 7200

We will respond to your complaint within 30 days and try to resolve it within 90 days. If we are unable to resolve your complaint within this time, or you are unhappy with the outcome, you can contact the Office of Australian Information Commissioner via its enquiries line 1300 363 992 or website <http://www.oaic.gov.au/> to lodge a complaint.

For further information on the Club's management of personal information, please contact the Club.

The Club may amend this Privacy Policy from time to time.





Gate 22 Station Street, Caulfield East VIC 3145

Ph: (03) 9257 7100