



## PRIVACY POLICY

The protection of personal information is important to the Victoria Amateur Turf Club (incorporating the Melbourne Racing Club), including its corporate group and related entities, the Pegasus Leisure Group and Gontran Cherrier (**Club**). This policy applies to any collection, use and disclosure of personal information by the Club.

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 and is limited to information which is reasonably necessary for the Club's functions or activities. 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 or debit 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 (which include racecourses, cafes, hotels and clubs). 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 and health, genetic information or disability.

If it is reasonably necessary in the circumstances and permitted by the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth), 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.

## MELBOURNE RACING CLUB PRIVACY POLICY

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

Circumstances in which the Club may collect your information include when you:

- become a member of the Club;
- enter any Club venues;
- subscribe to any publication of the Club, including electronic publications;
- provide details to the Club in an application, consent form, survey, feedback form, complaint or incident report;
- become a member of any rewards or loyalty program either operated by the Club or by a third party on behalf of the Club;
- enter personal information into, or agree to having your personal information entered into, one of the Club's online systems;
- participate in any racing activities of the Club, including as owners, trainers or jockeys, including making any enquiries in such capacities or nominating any racehorses into Club races;
- access the Club's or any of the venues' websites;
- contact the Club via email, telephone, fax or mail or engage with the Club via social media;
- participate in any program, activity, promotion, competition or event run by the Club;
- join an international tour of a horse race or other event or seek information in relation to a tour;
- purchase, redeem or claim tickets to horseracing or any other event organised by the Club or an authorised agent;
- purchase, redeem or claim merchandise, products or services from the Club or an authorised agent or licensee;
- make an enquiry regarding a dining, marquee, corporate or hospitality package or other function or event held at a Club venue;
- or your organisation negotiate or enter into any arrangements or contracts with the Club;
- are elected or appointed to the Executive Committee or a sub-committee of the Club;
- apply for or gain employment or a volunteer position with the Club;
- act as contractor or consultant for the Club;
- apply for media accreditation with the Club;
- seek information about Caulfield Village; or
- where the Club is required to do so by law (for example for the purposes of education, child protection, work health and safety laws, charitable collections, medical treatment).

### *Providing information*

Depending on the circumstances, some types of information will be required to be provided to us and some information might be optional. If you do not provide some or all of the information requested, or remain anonymous or use a pseudonym, 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 person from a third party where it is unreasonable or impractical to collect that information from the person directly.

## MELBOURNE RACING CLUB PRIVACY POLICY

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 (in accordance with the privacy policies of such 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.

### *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 Club activities (such as raceday and non-raceday events) 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 Pegasus Rewards Program is collected by the Club and Tabcorp Gaming Solutions who operate gaming equipment at our venues.

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.

### **For what purposes does the Club collect, store, 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:

- verify your identity;
- complete background checks;
- provide racing related services to you as a spectator and patron;
- provide member and venue-related benefits to you;
- provide employment to you as an employee of the Club;
- research, develop, run, administer and market programs, activities, ticketing opportunities, competitions and other events relating to the Club's activities;
- research, develop and market products, services, merchandise and special offers made available by us and third parties;
- respond to emergency situations involving or requiring medical treatment;
- administer, manage and provide you with access to the Club's websites;
- keep you informed of news and information relating to various Club events, activities and opportunities via various mediums.

## MELBOURNE RACING CLUB PRIVACY POLICY

### *Disclosure*

Where permitted by law, the Club may disclose your personal information to a range of organisations which include, but are not limited to:

- other organisations within the MRC corporate group;
- other organisations involved in horseracing programs in Australia;
- companies we engage to carry out functions and activities on the Club's behalf, including direct marketing;
- companies (such as Tabcorp Gaming Solutions) who are involved with the Club's rewards/loyalty programs;
- our affiliated third parties (such as sponsors and suppliers) with whom the Club has commercial relationships for business, marketing and related purposes;
- our professional advisers, including our accountants, auditors and lawyers;
- our insurers;
- the Victorian Commission for Gambling & Liquor Regulation;
- the Office of the Racing Integrity Commission;
- relevant sporting bodies such as Racing Victoria Limited, Federal and State Departments of Sport amongst others; and
- in [other circumstances](#) permitted by law.

In some circumstances, personal information may also be disclosed outside of Australia, including where we are contracting with international service providers (for example, one of the Club's software providers storing personal information is based in New Zealand). 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) where this complies with the Australian Privacy Principles and the *Spam Act 2003* (Cth).

Every person whose data is collected by the Club has the option to refuse to receive marketing 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:

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

## MELBOURNE RACING CLUB PRIVACY POLICY

### *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.

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 exercise their right to regularly access, review and update their personal information held by the Club. If you would like to access personal information that we hold about you, we require you to put your request in writing to the Club Privacy Officer 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 we do not allow you access to any part of the personal information we hold about you, we will tell you why. 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 in writing to the Club Privacy Officer at this address:

Legal Counsel  
Melbourne Racing Club  
PO Box 231  
CAULFIELD EAST VIC 3145  
Email: [privacy@mrc.net.au](mailto:privacy@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. Updates will be publicised on our websites.

*Policy last reviewed February 2018*