

PRIVACY POLICY – INTRALOT

Intralot Gaming Services Pty Ltd (**IGS**) ACN 136 875 673 and Intralot Australia Pty Ltd (**IA**) ACN 114 435 534 (which, for the purpose of this Privacy Policy includes any of their Related Bodies Corporate, as that term is defined in the *Corporations Act 2001 (Cth)*) (together, **Intralot, we, us, our**) is committed to providing you with the best possible customer service experience. Intralot is bound by the *Privacy Act 1988 (Cth)* (**Privacy Act**), the Australian Privacy Principles (**APPs**), the *Privacy and Data Protection Act 2014 (Vic)* and the Victoria Information Privacy Principles which set the standard for how we deal with your personal information.

You can find more information about the Privacy Act and the APPs at the Office of the Australian Information Commissioner's website at: www.oaic.gov.au.

IGS is also required to comply with Division 6 of Part 8A of the *Gambling Regulation Act 2003 (Vic)* (**GRA**) in relation to information collected by IGS through the Victorian Pre-Commitment System.

1 About Intralot and this Privacy Policy

IGS is the holder of the monitoring licence issued by Ministerial direction under section 3.4.46 of the GRA (**Monitoring Licence**), pursuant to which IGS provides the electronic monitoring system for all hotel and club gaming machines in Victoria.

IGS also provides the Victorian electronic gaming pre-commitment system and associated services (**YourPlay**) and provides technical support to gaming venues and players in Victoria via the Pre-Commitment Service Desk (**YourPlay Help Desk**).

IA manages and maintains the lottery system for the Government of Western Australia, Lotterywest, and provides software and support services to Lotterywest.

This Privacy Policy sets out the manner in which Intralot collects, uses, discloses and manages your personal information. By:

- visiting our websites, <http://www.yourplay.com.au> (**YourPlay Website**) or <http://www.igsmonitor.com.au> or <http://www.intralot.com.au> (**IGS/Intralot Website**) (together, **Websites**);
- submitting your personal information and other information for the purpose of establishing an account which enables you to access and use YourPlay (**YourPlay Account**);
- accessing your YourPlay Account online via the YourPlay Website, the YourPlay Kiosk or the YourPlay Portal at a gaming venue in Victoria;
- contacting the YourPlay Help Desk;
- playing an electronic gaming machine in Victoria using a YourPlay player card including by setting any form of loss or time limit on your gaming machine play;
- asking to be placed on one of our mailing lists;
- making an enquiry about our products and/or services;
- becoming a client or debtor of Intralot;
- acquiring goods through our websites or otherwise;
- supplying goods or services to us; or
- entering into an agreement with us,

you have taken to have read, and agree to the collection, use disclosure and handling of your personal information in accordance with this Privacy Policy.

While we believe in keeping your personal information highly secure, we also believe that you have the right to be informed about how we deal with that information so if, on reading this policy, you are unclear on any of the matters or simply want more information, please contact us by using the contact details provided below.

2 Collection of your personal information

We aim to collect personal information only if it is reasonably necessary to providing the service, product or information you have requested from us.

Personal information has the meaning given to that term in the Privacy Act and includes information or an opinion (whether true or not) about an identified individual, or an individual who is reasonably identifiable.

In the course of providing you with products and services, Intralot collects personal information in a variety of ways.

IGS may collect personal information about you when you:

- visit the YourPlay Website or the IGS Website;
- submit your personal information and other information for the purpose of creating a YourPlay Account;
- use YourPlay;
- access your YourPlay Account online via the YourPlay Website, the YourPlay kiosk or the YourPlay Portal at a gaming venue in Victoria;
- contact the YourPlay Help Desk;
- play an electronic gaming machine in Victoria using a YourPlay player card including when you set a loss or time limit on your machine play;
- use your YourPlay registered player card or casual player card at a gaming venue in Victoria; or
- contact IGS in your capacity as a venue operator.

IA may collect personal information about you during the course of providing services to Lotterywest.

Intralot will also collect personal information about you when you:

- ask to be placed on one of our mailing lists;
- make an enquiry about our products and/or services;
- become a client or debtor of Intralot;
- acquire goods through our websites or otherwise;
- supply goods or services to us; or
- enter into an agreement with us,

3 What personal information does Intralot collect?

In general you can assume that Intralot collects and holds the following personal information about you:

- your name;
- your address;
- your email address;
- your use of the goods and services which are provided by Intralot to you; and
- your telephone and fax number.

In addition to the information set out above, if you have a YourPlay Account, IGS may also collect and hold the following personal information about you:

- your name, address and any other details provided when you sign up to YourPlay either at a gaming venue or online;

- data collected through the YourPlay system when you play a gaming machine using your YourPlay Player Card, such as the date and time your use of a gaming machine commences and finishes, the location of the gaming machine, the amount that you wage on a gaming machine, including the amount of money won or lost;
- dates and times of when you access your YourPlay Account;
- dates and times you request activity statements;
- if you set loss limits or time limits on your game play at a gaming machine in Victoria, the details of those loss limits or time limits;
- when you contact the YourPlay Help Desk, IGS will retain all details of your request, including but not limited to, the date and time of your telephone call, your name and contact details and a description of your request or inquiry. Your telephone call to the YourPlay Help Desk may also be recorded by IGS for regulatory, quality or verification purposes;
- any other information collected by IGS from you or a third party as a result of your use of the YourPlay system or your YourPlay Account.

The information collected by IGS as the holder of the Monitoring Licence and as the provider of YourPlay is collected on behalf of, and owned by, the State of Victoria.

In addition to the information set out above, IA may also collect and hold personal information relating to your participation in:

- a Victorian public lottery which was conducted prior to 31 January 2015; or
- a lottery which is conducted by Lotterywest.

For each visitor to our Websites, we may also collect the following non-personally identifiable information:

- browser type, version and language;
- operating system;
- pages viewed while browsing the Websites; and
- page access times and referring website address.

When you access our Websites you may be required to submit personally identifiable information. This may include a unique username and password, or information which is required to recover a lost password.

4 How we collect personal information

Unless it is unreasonable or impracticable to do so, Intralot collects your personal information from you directly, including by using cookies on our Websites.

In many cases however, IGS will collect information about you (or third parties associated with you) from a third party such as:

- state regulatory bodies, including the Victorian Commission for Gambling and Liquor Regulation (**VCGLR**) and the Victorian Department of Justice (**DOJ**);
- venue owners or operators in Victoria, including Crown Casino; and
- our contractors and service providers, who provide services to us such as the maintenance and support of YourPlay,

or from other third parties.

IA may also collect personal information about you from the VCGLR, the State Revenue Office of Victoria, and in relation to players of the Lotterywest lottery, our professional advisors, lottery retail outlets located in Western Australia and the Government of Western Australia (trading as Lotterywest).

In some cases we will be required or authorised by Australian law, including under the GRA as amended from time to time, or the order of a court or tribunal, to collect personal information about you. In many cases, we are required by statute and under our contractual obligations with the Victorian Government (in relation to IGS) and the Government of Western Australia (in relation to IA) to collect personal information about you.

Accordingly, we collect and hold a broad range of personal information gathered during the course of providing our products or services. However, we strive to ensure that we collect and hold only that personal information which is relevant and necessary to the product, service or information you have requested from us.

At the time of collection, or as soon as practicable after we have collected it, we will take reasonable steps to notify you of the collection and of any matters relevant to the collection, unless it is obvious from the circumstances that you would know or would expect us to have the information.

5 How We Use Cookies

We may use cookies on some areas of our Websites. A cookie is a small file saved on your computer's hard drive. When you return to our Website, the data saved in the cookie is sent back to the Website. We use cookies to gauge visitor traffic, trends and to deliver personalised content to you while you are at our Websites. The cookies we use in no way give us access to your computer or any information about you, other than the information you choose to share with us. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the Websites.

6 Purpose of collection

We collect personal information primarily to:

- provide you with the goods, services and information that you request from us or from third parties to which we provide goods and services, such as gaming venues, including YourPlay;
- comply with our statutory and contractual obligations to the Victorian Government (in relation to IGS) and the Government of Western Australia (in relation to IA); and
- provide you with information about our products and services.

If it is reasonable to expect that we would use or disclose your personal information for purposes which are related to the above primary purposes, we may also use or disclose that personal information to:

- assist you with enquiries or complaints;
- develop and improve our customer service;
- improve customer service by means of research, marketing, service or product development or planning;
- carry out statistical analysis and generate statistical reports in relation to your use of goods and services provided by us (although any such analysis or report will not identify you);
- invite you to seminars or events hosted by Intralot; and
- inform you of developments at Intralot and other services that we can provide.

If you sign up to YourPlay (whether as a casual or registered member), IGS will collect your personal and other information from you or from gaming venues for the primary purpose of managing and administering the YourPlay program in Victoria and providing you with products and services related to YourPlay, including:

- allowing you to access and use the features available under a YourPlay Account;
- issuing you with a PlayerCard;
- allowing you to set loss limits or time limits on your gaming machine play in Victoria; and

- promoting, advertising and marketing promotions to you in relation to YourPlay (including by means of email, SMS, post, telephone calls or in-person presentation).

Information collected through our Websites may be used by Intralot for the purpose of gauging visitor traffic, trends and delivering personalised content to you while you are at our Websites.

We may share your personal information between IGS and IA for the purposes of providing the services set out above.

We may otherwise use your personal information to comply with any law, including the GRA, and to comply with any lawful request of a law enforcement agency or government authority.

Without limiting the above, IGS will not collect, store, disclose, deliver or use data generated from YourPlay or the monitoring system unless it is to be used for purposes directly connected to the provision of services by IGS in accordance with the GRA, the Monitoring Licence, the direction issued under section 3.8A.2 of the GRA and IGS' agreements with the Victorian Government in relation to the provision of monitoring and pre-commitment services.

Where possible, we will provide you with a choice to opt-out of certain marketing communications. We will respect your request to decide whether or not to receive these marketing communications.

7 Sharing of your personal information

In some cases, IGS is required to disclose certain personal and other information collected from you under IGS' statutory and contractual obligations with the Victorian Government and the VCGLR to provide monitoring services and YourPlay and for reporting purposes, including technical standards. Any information Intralot provides to the Victorian Government and the VCGLR will not identify you.

IGS is bound by Division 6 of Part 8A of the GRA in relation to the disclosure of certain information collected from you via YourPlay and the associated YourPlay functions.

IGS may disclose your personal or other information collected to the following third parties:

- to the Victorian Government, the VCGLR and any other person authorised by the Victorian Government or the VCGLR in the performance of our functions under Victorian statute and to enable those parties to analyse YourPlay usage and trends (although such information will not identify you);
- the monitoring service provider that is appointed by the VCGLR to provide monitoring services in accordance with sections 3.4.59LF or 3.4.59LG of the GRA;
- gaming venue owners or operators, including to inform them of statistics in relation to player information and to facilitate the use and administration of YourPlay at that gaming venue (although such information will not identify you);
- an enforcement agency that is approved as an enforcement agency by the Minister, as set out in the GRA (i.e., the police, or any other agency such as the VCGLR);
- if you use a player card at a gaming machine at Crown Casino, IGS will disclose to the Crown Casino operator all data generated from your use of that gaming machine for the purpose of facilitating your use of YourPlay at Crown Casino;
- external providers of products or services that we may use to administer and manage YourPlay, including parties that provide the hardware and software required for YourPlay;
- third parties who conduct statistical analysis and generate statistical reports on our behalf, or on behalf of the Victorian Government in relation to your use of goods and services provided by us (although any such analysis or report will not identify you); and
- YourPlay Help Desk staff, for the purpose of providing you with assistance in relation to your YourPlay account.

IA may disclose your personal information to:

- the Government of Western Australia, including in relation to Lotterywest for reporting purposes; and

- the State Revenue Office of Western Australia.

Intralot may also provide your personal information to:

- our professional advisors (including our lawyers and barristers), including for litigation purposes; and
- external providers of services that we may use to operate our business and manage our business systems (for example, this may include market research analysts, file storage service providers, database and mailing service providers, couriers and/or freight service providers, printers, call centers, providers of payment processing and identity verification services and IT technicians who may need access when providing on-site support (although it is our practice for them to work under supervision).

Those companies will be permitted to access only the personal information they need to deliver the service to Intralot or to you. Intralot takes reasonable steps to ensure that these organisations are bound by confidentiality and privacy obligations in relation to the protection of your personal information.

Intralot may also disclose your personal or other information to IGS' Related Bodies Corporate (as that term is defined in the *Corporations Act 2001* (Cth)), including IGS' parent company Intralot S.A. Integrated Lottery Systems and Services (an entity located in Greece and disclosure to whom may result in the transfer of data, including your personal information, to Greece).

We are not otherwise likely to disclose your information to overseas recipients unless it is with your consent, or the disclosure is required or authorised by law. We will only disclose to overseas recipients if we reasonably believe that the recipient is subject to a law or scheme that will protect your personal information in a way that is substantially similar to the way the APPs protect your personal information, or if we have your consent.

The privacy and collection practices of entities to which we disclose personal information are governed by their own privacy policies and collection notices.

We will not otherwise disclose information about you unless the disclosure:

- is required or authorised by law, including under the GRA, the *Gambling Regulations 2015 (Vic)* or other gaming related legislation; or
- you have consented to our disclosing the information about you.

8 Quality of your personal information

We aim to ensure that your personal information is accurate, complete and up to date. To assist us in this, you need to provide true, accurate, current and complete information about yourself as requested and properly update the information to us to keep it true, accurate, current and complete.

If you believe that the information we hold is inaccurate or incomplete, please contact us and we will use all reasonable efforts to correct the information.

In the event that we do not believe the information to be incorrect, we will take reasonable steps to add a statement to the information claiming that you believe the information is inaccurate, incomplete, out of date.

9 Securing your personal information

We are committed to maintaining the security and confidentiality of your personal information and we will take reasonable precautions to protect your personal information from unauthorised disclosure, use or alteration. Except where IGS is required to retain your information in its role as Monitoring Licensee or in connection with YourPlay, we will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed. Any data that IGS obtains through YourPlay will be retained and will not be deleted, destroyed or otherwise disposed of except with the written consent of the Victorian Government and in accordance with the *Public Records Act 1973* (Vic).

Intralot's policies and procedures have been certified as ISO 27001 compliant. Our systems are subject to an annual audit which includes system control and penetration and vulnerability testing. In addition to this, IGS is regularly audited by the VCGLR to ensure that its security is in line with the requirements of the VCGLR.

We also have the following security measures in place to protect your information:

- our offices are securely locked after hours and our offices require swipe card access;
- all computers have password protection;
- all computers linked to our intranet are password protected and virus protected;
- our office is subject to external and internal camera recording;
- our Websites are protected by a firewall; and
- our employees sign confidentiality agreements as part of beginning employment at Intralot.

10 Changes to this Privacy Policy

Intralot reserves the right to make amendments to this Privacy Policy at any time for any reason. We will publish any updated Privacy Policy on our Websites.

11 Accessing and correcting your personal information

You have a right to request access to, or the correction of, your personal information that we hold about you, subject to exceptions allowed by law. If you would like to do so, please contact us using the details provided at paragraph 14 below. You may be required to put your request in writing for security reasons.

We will give you access to, or correct, your personal information unless there is a lawful reason for refusing your request for access or correction. If we refuse your request we will give you a written notice explaining our reasons for that refusal and how you may complain about that refusal.

12 Change in control of IGS or IA

Subject to our statutory obligations, if we sell or otherwise transfer part or the whole of IGS or IA or our assets to another organisation (including in the course of a transaction like a sale, merger or acquisition or as part of a dissolution, liquidation, administration, receivership or other form of insolvency), you agree that your personal information that is collected by IGS or IA (including in the course of IGS' capacity as the holder of the Monitoring Licence and as the provider of YourPlay) may be disclosed to a third party, prospective buyer, transferee, purchaser or insolvency practitioner and that this is reasonable to enable that party to continue, manage, dissolve, restructure or wind-up the business.

13 Complaints

If you have a complaint about our collection, use or disclosure of your personal information, or you wish to make a complaint about a breach of the APPs, please contact our Privacy Officer at the details set out below.

In your complaint, please set out the details of your complaint and your contact details. Our Privacy Officer will contact you to acknowledge your request and ask for any other applicable information. Our Privacy Officer will then investigate the issue and advise you in writing of the outcome.

You can also make a complaint to the Office of the Australian Information Commissioner. Further information is available at www.oaic.gov.au.

14 Contacting us

Intralot welcomes your comments regarding this Privacy Policy.

If you have any questions about this Privacy Policy and you are a member of YourPlay, please contact us at the YourPlay Help Desk on [1300 838 031](tel:1300838031) or via email at support@yourplay.com.au

If you otherwise have any questions about this Privacy Policy and would like further information, please contact our Privacy Officer at the following details.

Email: customerservices@igsmonitor.com.au

Phone: [1300 764 495](tel:1300764495)