



## Purpose

VRC is committed to establishing and maintaining a framework for the collection, use, storage, disclosure, security, access and correction of the Personal Information it collects, uses, stores and discloses. VRC is committed to complying with its obligations under the Privacy Act 1988 (Cth), including the Australian Privacy Principles and the Notifiable Data Breaches scheme, and any other privacy or data protection laws that apply to particular VRC activities, locations or individuals, including the EU GDPR and UK GDPR where applicable.

This Privacy Policy is freely available on VRC's website at [www.flemington.com.au](http://www.flemington.com.au) and will be provided in hard copy upon request to our Privacy Officer.

## Scope

This Privacy Policy relates to Victoria Racing Club Limited (VRC) and confers rights on members, patrons, guests, customers, subscribers, competition entrants, employees, contractors, job applicants, volunteers, racing participants, visitors and any other individual whose personal information is collected, held, used or disclosed by VRC

## Definitions

- **Applicable Privacy Laws:** Collectively, the Privacy Act, EU GDPR and UK GDPR.
- **Australian Privacy Act:** The Privacy Act 1988 (Cth).
- **Australian Privacy Principles or APP:** Those principles set out in Schedule 1 of the Australian Privacy Act.
- **Automated decision-making:** The use of a computer program to make, or substantially assist in making, a decision using personal information.
- **EU GDPR:** Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), as amended from time to time.
- **Personal Information:** Information or an opinion about an identified individual, or an individual who is reasonably identifiable: (a) whether the information or opinion is true or not; and (b) whether the information or opinion is recorded in a material form or not. Personal Information about an individual includes Sensitive Information about the individual.
- **Privacy Officer:** The person performing the role of Privacy Officer from time to time.
- **Privacy Policy:** The contents of this policy as updated from time to time.
- **Sensitive Information:** Information or an opinion about an individual's racial or ethnic origin; political opinions; membership of a political association; religious beliefs or affiliations; philosophical beliefs; membership of a professional or trade association; membership of a trade union; sexual orientation or practices; criminal record; health information; genetic information that is not otherwise health information; biometric information used for automated biometric verification or biometric identification; or biometric templates.



- **UK GDPR:** The Retained Regulation (EU) 2016/679 (UK GDPR) and the Data Protection Act 2018 (DPA 2018), as amended from time to time.
- **VRC:** Victoria Racing Club Limited.

## Policy Statement

This policy aims to:

- Comply with applicable privacy and data protection laws and maintain an up-to-date APP privacy policy and related collection notices;
- Incorporate the Applicable Privacy Laws into the way VRC works and interacts with others;
- Identify VRC's activities and functions giving rise to the legitimate collection of Personal Information;
- Ensure that service providers, ticketing providers, marketing platforms, gaming and hospitality systems, cloud vendors and other third parties handling personal information for VRC are subject to appropriate contractual controls, security requirements, access restrictions, audit rights and cross-border privacy protections;
- Establish a training program to ensure that VRC staff are aware of their obligations;
- Establish a privacy-by-design process, including privacy impact assessment where appropriate, for new initiatives, systems, surveillance tools, analytics, marketing technology, gaming systems and artificial intelligence or automated decision-making use cases;
- Ensure the integrity of VRC's handling of Personal Information; and
- Establish a complaint handling service to investigate possible privacy breaches.

## Procedures

### **VRC Complies with the Applicable Privacy Laws**

We manage personal information in an open and transparent way and maintain practices, procedures and systems designed to ensure compliance with applicable privacy obligations, including the Australian Privacy Principles.

We provide privacy training at induction and periodic refresher training, with additional role-based training where staff handle higher-risk information, CCTV, gaming, AML or customer analytics data.

We review our contractual arrangements with third parties who handle Personal Information to ensure that those third parties are subject to the Applicable Privacy Laws or, where the Personal Information will be held outside Australia, the UK or the EU (as the case may be), substantially similar protections.

We assess the privacy impact of new initiatives, systems, analytics, surveillance, identity verification, customer profiling, responsible gambling technologies, AML/CTF controls and any artificial intelligence or computer-assisted decision tools before implementation and when material changes occur.



We review our compliance with the Applicable Privacy Laws, including our obligation to review this policy at least annually and whenever there is a material change to law, technology, data use, VRC operations or third-party arrangements that affects personal information handling.

## **VRC Collects, Uses, Discloses, Holds, Retains, Destroys or De-identifies Personal Information Related to its Functions and Activities**

We collect, use, hold and disclose Personal Information related to the following functions and activities for purposes connected with our functions and activities, with consent where required and as otherwise permitted or required by law, including:

- Recruitment;
- Membership;
- Ticketing, facilities and dining;
- Marketing;
- Racecourse operations;
- Administration;
- Management of contractors and employees;
- Sponsorship and partnerships;
- Events;
- Competitions;
- Customer service;
- Gaming operations;
- Newsletter subscription;
- Security and CCTV;
- Work health and safety;
- Responsible gambling and self-exclusion;
- AML/CTF compliance;
- Fraud prevention and investigations;
- Complaints handling;
- Digital services, Wi-Fi and website analytics; and
- Regulatory or legal reporting.

We are open and transparent about the management of Personal Information and we have identified the type of Personal Information we collect, how it is collected and how it is used and disclosed (See Appendix 1 – Collection, Use & Disclosure of Personal Information Disclosure Document, which is updated from time to time).

We and authorised third parties use cookies and similar tracking technologies on our website and digital platforms. VRC takes reasonable steps under APP 8.1 to ensure that any overseas recipients of personal data through these technologies handle that information in a manner consistent with the Australian Privacy Principles. You may manage your preferences via our



cookie consent banner or by adjusting your browser settings. Refusing certain cookies may limit website functionality. We also collect on-course device identifiers (MAC addresses) as described in Appendix 1. For further information or to exercise your preferences, contact our Privacy Officer.

We take reasonable steps, including both technical and organisational measures, to protect Personal Information from misuse, interference, loss, unauthorised access, modification or disclosure. Personal information may be held via secured email servers; secured hard drives and servers; physical files in locked storage; CCTV and gaming and venue management systems; CRM database; websites and applications; and cloud-based platforms maintained by authorised third-party processors under data processing agreements.

We retain personal information only for so long as it is reasonably required for the purpose for which it was collected, to meet legal, regulatory, dispute resolution, audit or evidentiary requirements, or as otherwise permitted by law. When personal information is no longer required and we are not required by law or court or tribunal order to retain it, we take reasonable steps to destroy or de-identify it.

Where VRC is aware that an eligible data breach has occurred, VRC will: (a) carry out a prompt assessment of whether the breach is likely to result in serious harm to individuals whose personal information was involved; (b) where serious harm is likely, notify affected individuals and the OAIC as soon as practicable; and (c) include in the notification a description of the breach, the kinds of personal information involved, steps individuals should take to protect themselves, and how to contact our Privacy Officer. VRC maintains a Data Breach Response Plan that governs how potential breaches are identified, contained, assessed and notified in accordance with Part IIIIC of the Privacy Act.

## **For Individuals in Australia: How Do I Access and Correct My Personal Information?**

We take reasonable steps to notify individuals, or otherwise ensure they are aware, of the matters required by law at or before the time personal information is collected (on a form or electronically), including: who we are; the purpose of collection; whether collection is required or authorised by law; the main consequences if information is not provided; usual disclosures; likely overseas disclosures; and how to access this policy and seek access or correction. Requests for access or correction should be forwarded to our Privacy Officer using any of the following methods:

By email:           privacy@vrc.net.au  
By post:            Private & Confidential  
                        The Privacy Officer  
                        Victoria Racing Club Limited  
                        448 Epsom Road, Flemington VIC 3031

We will ensure that all requests for access or correction are considered and responded to within a reasonable period, generally within thirty (30) days of receipt, subject to verification of identity and any lawful grounds for refusing or limiting access

## **For Individuals in the European Union and the United Kingdom: What Are My Rights in Relation to My Personal Information?**

- Access: You have a right to access Personal Information held by us about you.



- **Rectification:** You have a right to require us to rectify any inaccurate Personal Information held by us about you.
- **Erasure:** You have a right to require us to erase Personal Information held by us about you. This right will only apply where (for example): we no longer need to use the Personal Information to achieve the purpose we collected it for; or where you withdraw your consent if we are using your Personal Information based on your consent; or where you object to the way we process your Personal Information (in line with 4.4(n) below).
- **Restriction of processing:** In certain circumstances, you have a right to restrict our processing of Personal Information held by us about you. This right will only apply where (for example): you dispute the accuracy of the Personal Information held by us; or where you would have the right to require us to erase the Personal Information but would prefer that our processing is restricted instead; or where we no longer need to use the Personal Information to achieve the purpose we collected it for, but you require the Personal Information for the purposes of dealing with legal claims.
- **Data portability:** In certain circumstances, you have a right to receive Personal Information, which you have provided to us, in a structured, commonly used and machine-readable format. This right will only apply where the processing is based on consent or a contract and the processing is carried out by automated means. You also have the right to require us to transfer this Personal Information to another organisation, at your request.
- **Objection to processing:** You have a right to object to our processing of Personal Information held by us about you where the processing of such Personal Information is necessary for the purposes of our legitimate interests, unless we are able to demonstrate, on balance, legitimate grounds for continuing to process Personal Information which override your rights or which are for the establishment, exercise or defence of legal claims.
- **Withdrawal of consent:** You have a right to withdraw your consent where we are relying on it to use your Personal Information (for example, to provide you with marketing information about our services or products).

The rights above are not absolute and in some circumstances, we may be unable to accept your request, in which case we will respond to you to explain why. Requests to exercise your rights above should be sent to our Privacy Officer:

By email:        [privacy@vrc.net.au](mailto:privacy@vrc.net.au)  
By post:        Private & Confidential  
                    The Privacy Officer  
                    Victoria Racing Club Limited  
                    448 Epsom Road, Flemington VIC 3031

## **Serious Invasions of Privacy**

Under the Privacy and Other Legislation Amendment Act 2024 (Cth), individuals have a statutory right to bring a civil action against VRC where VRC has seriously invaded their privacy by intrusion upon their seclusion or by misuse of their personal information, and the invasion would be considered highly offensive to a person of ordinary sensibilities. VRC takes this obligation seriously and manages its personal information practices to minimise the risk of serious privacy invasions. If you believe VRC has seriously invaded your privacy, you may seek



independent legal advice, lodge a complaint with the OAIC, or raise the matter directly with our Privacy Officer as described in Sections 4.6 and 4.7.

## **How Can I Complain About a Breach of the Applicable Privacy Laws Affecting My Personal Information?**

For individuals in Australia: You may contact the Privacy Officer to discuss any concerns over our handling of your Personal Information by calling 03 8378 0888.

For individuals in Australia, the EU and the UK: Alternatively, you may lodge a complaint with the Privacy Officer:

By email:       privacy@vrc.net.au  
By post:        Private & Confidential  
                  The Privacy Officer  
                  Victoria Racing Club Limited  
                  448 Epsom Road, Flemington VIC 3031

## **How Will My Complaint Be Handled?**

Our Privacy Officer will consider all complaints objectively in line with our Privacy Complaint Procedure and will:

- Acknowledge receipt of the complaint in writing;
- Conduct an initial assessment of the complaint;
- Investigate or engage an appropriate investigator to investigate the complaint;
- Make a determination as to whether VRC has breached an Australian Privacy Principle;
- Consider a remedy or action to be taken; and
- Communicate the decision to the person making the complaint within 30 days of receiving the complaint (where possible).

If you are unsatisfied with how VRC handles your request or complaint, you have the right to lodge a complaint with the OAIC. Under the Privacy and Other Legislation Amendment Act 2024 (Cth), the OAIC has expanded enforcement powers including the ability to: issue infringement notices and compliance notices against VRC directly; seek civil penalties; and conduct public inquiries.

- For individuals in Australia: Office of the Australian Information Commissioner.
- For individuals in the EU: List of EU Data Protection Authorities.
- For individuals in the UK: Information Commissioner's Office.



## Compliance

- All concerns relating to this policy may be raised with a manager, the People Team, or in accordance with the relevant policies and procedures.
- All matters will be handled confidentially, impartially and in accordance with principles of procedural fairness.
- Breaches of this policy may result in disciplinary action, up to and including termination of employment or engagement.

## Related Documents

- **Appendix 1:** Collection, Use & Disclosure of Personal Information Disclosure Document
- **Appendix 2:** Privacy Complaint Form

## Review & Version Control

Approved by	Chief Executive Officer (CEO)
Next review date	13 April 2028



## Appendix 1: Collection, Use & Disclosure of Personal Information Disclosure Document

### *Your Right to Opt Out of Direct Marketing*

Wherever we use your personal information for direct marketing, you have the right to opt out at any time at no cost. To opt out: (i) Members: update preferences at [myvrc.com.au](http://myvrc.com.au); (ii) All individuals: email [privacy@vrc.net.au](mailto:privacy@vrc.net.au) or phone 03 8378 0888. Unsubscribe links are included in all electronic marketing communications. Opting out of marketing will not affect transactional or service-related communications.

RECRUITMENT					
Type of Personal Information	How Collected	Why Collected	How Used	How Disclosed	Overseas Disclosure
Name, contact details, work history, references. Where relevant to the role, VRC may also collect information for screening, right to work, qualifications, licences, referee checks or pre-employment assessments, with appropriate notice. Sensitive information and criminal history information will only be collected where	Recruitment records — Resume, Application Letter	To determine suitability for the role	To inform the interview panel and interview process	May be disclosed to referees and to internal stakeholders with a role in employment activities	Not unless otherwise stated



reasonably necessary and permitted by law.					
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VRC MEMBERSHIP					
Type of Personal Information	How Collected	Why Collected	How Used	How Disclosed	Overseas Disclosure
Name, date of birth, contact details, occupation, membership history or integrity-related information only where reasonably necessary for membership suitability assessment under VRC rules or legitimate integrity processes	Membership Application Forms	To determine suitability for membership	Ticketing entitlements, invitations to events, Rewards Program, Voting Rights, AGM Notifications. You have the right to opt out of direct marketing at any time — see opt-out notice above.	May be disclosed to third parties who provide goods or services associated with membership, including printing, advertising and mail-house organisations. May be disclosed to third-party market research and data analysis companies.	Not unless otherwise stated
Name, address	Phar Lap Club Subscription	To facilitate membership	May be used for ticketing entitlements and invitations to events. May be used for direct marketing. You have the right to opt out of direct	May be disclosed to third parties who provide goods or services associated with membership, including printing,	Not unless otherwise stated



			marketing at any time — see opt-out notice above.	advertising and mail-house organisations.	
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VRC RACE DAY TICKETING, FACILITIES & DINING					
Type of Personal Information	How Collected	Why Collected	How Used	How Disclosed	Overseas Disclosure
Member contact details, guest name and contact details, date of birth or government-issued identification details only where reasonably necessary for age verification, security, travel or other specific operational requirement notified at collection	Application forms for race day tickets, dining, booking facilities and car parks	To facilitate ticketing	May be used for booking facilities, catering and payment, to allocate ticket access, to send notices and booking confirmation. May be used for direct marketing. You have the right to opt out of direct marketing at any time — see opt-out notice above.	May be disclosed to third parties who provide goods or services associated with membership. Payment details securely disclosed to the bank using data encryption. May be disclosed to third-party market research and data analysis companies.	Not unless otherwise stated
Name, contact details, payment card or transaction details processed through VRC's payment service providers	Registration — Entertainment and Dining	To facilitate ticketing, booking facilities, catering and payment	May be used for direct marketing. You have the right to opt out of direct marketing at any time — see opt-out notice above.	May be disclosed to third parties associated with membership. Payment details securely disclosed to the bank using data	Not unless otherwise stated



				encryption. May be disclosed to third-party market research and data analysis companies.	
General Admission customer and other guests' name and contact details	Details obtained from a third-party ticketing company with rights to sell race day tickets	To facilitate ticketing, booking facilities and catering	May be used for event administration and, where the individual has consented or another lawful basis applies, direct marketing in accordance with applicable law	May be disclosed to third parties associated with membership, including printing, advertising and mail-house organisations.	Not unless otherwise stated

MARKETING ACTIVITY					
Type of Personal Information	How Collected	Why Collected	How Used	How Disclosed	Overseas Disclosure
Images/Photographs. VRC may use signage, event terms, accreditation terms or other notices to explain event photography and	Official photographers operating in the public arena during race days	To promote VRC, membership and ticket sales	May be used on promotional material	May be disclosed to third parties associated with membership promotion and ticket	Internet

# Privacy



<p>filming. Where practicable, VRC will consider reasonable requests relating to featured promotional use of identifiable individuals.</p>				<p>sales and displayed on the internet.</p>	
<p>Device ID (MAC address). The device ID number is collected if the device is turned on and located on course. Name, email and residential postcode is collected when the user consents via the VRC app.</p>	<p>Device ID collected if device is on course. Name, email and postcode collected when user consents on the VRC application portal.</p>	<p>To identify performance analytics and make improvements to our offerings based on customer movement.</p>	<p>The MAC address may be linked to our customer database and used for direct marketing, service messaging and market research and customer analytics. You have the right to opt out of direct marketing at any time — see opt-out notice above.</p>	<p>May be disclosed to market research companies where consent is obtained; otherwise, any disclosure will be de-identified before release.</p>	<p>Not unless otherwise specified</p>
<p>Device ID number, IP address, cookies identifier, website activity</p>	<p>Collected when a user visits our websites</p>	<p>Targeted advertising and analytics</p>	<p>Used by us or third parties engaged by us to facilitate targeted advertising or tracking</p>	<p>VRC uses third-party analytics and advertising providers (which may include providers located overseas, including in the United States, such as Google Analytics) who may</p>	<p>Possible overseas transfer — see disclosure column</p>



				<p>receive personal or device-related data. VRC takes reasonable steps to ensure equivalent privacy protections apply. VRC to confirm specific recipients and countries before publication.</p>	
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TOURS					
Type of Personal Information	How Collected	Why Collected	How Used	How Disclosed	Overseas Disclosure
Contact person and contact details	Melbourne Cup Tour Tender Application Form	To facilitate travel plans	May be used to obtain survey response for quality and service improvement	May be disclosed to travel agency and other third parties involved in arranging travel and accommodation.	Not unless otherwise stated
Member name and contact details, passport number. Guest name, contact details and passport number.	Members' Tours Application Form	To facilitate travel plans	To send tickets and notices to participants. May be used for direct marketing. You have the right to opt out of direct marketing at	May be disclosed to the third-party tour operator.	Not unless otherwise stated



			any time — see opt-out notice above.		
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<b>VENUE — WORKERS AND ATTENDEES</b>					
<b>Type of Personal Information</b>	<b>How Collected</b>	<b>Why Collected</b>	<b>How Used</b>	<b>How Disclosed</b>	<b>Overseas Disclosure</b>
Name and contact details, medical alerts, emergency contact details. Sensitive information, including health information, will only be collected where reasonably necessary for health and safety, incident response or legal obligations, and access will be limited to those with a need to know.	Induction Acknowledgement of Personal Details Form. Updates obtained from time to time. Racecourse check-in information collected upon entry.	To evidence completion of induction. To ensure the health and safety of contractors, employees and other individuals at the racecourse.	May be used to monitor incidents and emergencies and to maintain health and safety at our premises.	May be disclosed to third parties involved in medical or emergency relief including medical or emergency personnel. May be disclosed internally for health and safety purposes.	Not unless otherwise stated
CCTV Images	CCTV footage operating continuously throughout Flemington Racecourse, facilities,	Safety, asset protection, incident investigation, and to assist law enforcement or racing	Collected for safety, asset protection, incident investigation. Footage retained 30 days for general footage, longer where incident flagged, then	Accessible only to authorised personnel. May be disclosed to legal representatives, law enforcement agencies, and Racing Victoria stewards or	Not unless otherwise stated



	grounds and Headquarters Tavern	integrity bodies where required	destroyed unless required for active investigation.	integrity officers where required.	
Health status (where reasonably necessary to manage work health and safety, incidents, access controls or legal obligations that apply at the time)	Collected where reasonably necessary to manage WHS, incidents, access controls or applicable legal obligations	To protect the health and safety of individuals at the venue and comply with applicable government and industry requirements	To maintain health and safety at our premises and comply with applicable government or industry requirements	May be disclosed to obtain health and legal advice and as required by law.	Not unless otherwise stated

<b>WORK HEALTH AND SAFETY</b>					
<b>Type of Personal Information</b>	<b>How Collected</b>	<b>Why Collected</b>	<b>How Used</b>	<b>How Disclosed</b>	<b>Overseas Disclosure</b>
Name, contact details, witness details, incident details including injury	Incident Report	To investigate the incident and determine root cause. To manage and control risks.	May be used to manage WHS and Risk	May be disclosed to medical personnel and legal representatives.	Not unless otherwise stated



SPONSORSHIP AND PARTNERSHIPS					
Type of Personal Information	How Collected	Why Collected	How Used	How Disclosed	Overseas Disclosure
Name and contact details	Membership Application Forms, Event Data Cards	To administer sponsor or partner activations and, where the individual has been clearly notified and has given any required consent, to share details with named or described sponsors or partners for their own marketing or engagement purposes.	Sponsor and partner activations	May be disclosed to our sponsors or partners.	May be held overseas by our sponsors who are located abroad. This may include countries such as the United Arab Emirates. VRC takes reasonable steps under APP 8.1 to ensure overseas recipients handle personal information consistently with the Australian Privacy Principles or obtains consent where required.

VRC — EVENTS					
Type of Personal Information	How Collected	Why Collected	How Used	How Disclosed	Overseas Disclosure
Name and contact details	Event Data Cards	To collect data for direct marketing purposes	May be used for direct marketing only where the individual has consented, would	May be disclosed to our local web host.	Not unless otherwise stated



			reasonably expect it, or another lawful basis applies, and always with an unsubscribe mechanism where required. You have the right to opt out of direct marketing at any time — see opt-out notice above.		
Customer satisfaction data	Customer Satisfaction Surveys	Quality assurance, product development and direct marketing	May be used for direct marketing only where the individual has consented, would reasonably expect it, or another lawful basis applies, and always with an unsubscribe mechanism where required. You have the right to opt out of direct marketing at any time — see opt-out notice above.	May be disclosed to our local web host. May be disclosed to third-party market research and data analysis companies.	Not unless otherwise stated



VRC — COMPETITIONS					
Type of Personal Information	How Collected	Why Collected	How Used	How Disclosed	Overseas Disclosure
Name and contact details	VRC Competition Entry Forms, Door Prize Forms, Sponsors Competition Entry Forms	To facilitate the draw	May be used for direct marketing only where the individual has consented, would reasonably expect it, or another lawful basis applies, and always with an unsubscribe mechanism where required. You have the right to opt out of direct marketing at any time — see opt-out notice above.	May be disclosed to our local web host. May be disclosed to sponsors or partners.	Not unless otherwise stated
Name, contact details, date of birth, gender. Note: VRC to confirm gender collection remains reasonably necessary for each specific form. Where minors may enter, age-appropriate notices and parental/guardian	Fashions on the Field entry forms	Competition registration	May be used for direct marketing only where the individual has consented, would reasonably expect it, or another lawful basis applies, and always with an unsubscribe mechanism where required. Competition	May be disclosed on our website and promotional material. May be disclosed to sponsors or partners for direct marketing.	Not unless otherwise stated



requirements must be applied.			forms clearly state which uses are necessary for administering the competition and which are optional marketing consents. You have the right to opt out of direct marketing at any time — see opt-out notice above.		
Name, contact details and nature of enquiry	Online Contact Us Form; Data Capture Form	To give customers an electronic alternative for lodging an enquiry	May be forwarded to the person who can best respond to the enquiry	May be disclosed to staff or contractors.	Not unless otherwise stated

## GAMING OPERATIONS

Type of Personal Information	How Collected	Why Collected	How Used	How Disclosed	Overseas Disclosure
Name, date of birth, contact details, occupation	Loyalty program membership application	For membership registration	May be used to notify members of offers and for direct marketing. You have the right to opt out of direct marketing at	May be disclosed to the TGS (Diamond Rewards Program Host) to conduct industry promotions.	Not unless otherwise stated



			any time — see opt-out notice above.		
Identity and financial information collected where a gaming win or transaction requires reporting under the AML/CTF Act 2006 (Cth) or Gambling Regulation Act 2003 (Vic). Includes patron name, date of birth, contact details and, where required by law, identity document details. Retained for 7 years from date of last transaction.	Gaming wins exceeding \$2,000 logbook	To comply with Anti-Money Laundering and Counter-Terrorism Financing laws	May be used to monitor suspicious transactions	May be disclosed to AUSTRAC, VGCCC and LCV as required by law, and to authorised gaming system providers under data processing agreements.	No
Image and name of self-excluded person	Forwarded to VRC by Australian Hotels Association (AHA) — Self-Exclusion Program	To facilitate the self-exclusion process	Will be used to monitor and prevent gaming by self-excluded participants	Will be made available only to staff and service providers with a legitimate operational need to identify and support self-excluded patrons and manage compliance obligations. If a	No



				breach arises, details of the incident will be disclosed to AHA.	
Images (CCTV at Headquarters Tavern)	CCTV footage at Headquarters Tavern	To monitor for safety purposes. To protect our assets.	May be used to investigate incidents	May be disclosed to legal representatives and law enforcement agencies.	Not unless otherwise stated
Biometric information (facial recognition templates) collected via Facial Recognition Technology (FRT) for automated biometric identification.	FRT system at gaming venue entry points; biometric templates generated at point of collection	To identify self-excluded patrons and enforce exclusion orders under the Gambling Regulation Act 2003 (Vic).	Used only to match against the self-exclusion register. Templates stored in encrypted, access-controlled system. Destroyed within 30 days of expiry of the relevant exclusion period or upon request.	Disclosed to VGCCC as required by law. May be disclosed to the FRT system provider under a data processing agreement with strict access controls.	No
Identity document information (e.g., driver's licence or passport details) collected for identity verification as part of AML/CTF customer due diligence and responsible gambling obligations. VRC applies data	Directly from the individual at point of gaming enrolment or upon trigger of reporting obligations	To verify identity as required by the AML/CTF Act 2006 (Cth) and Gambling Regulation Act 2003 (Vic).	Retained for 7 years from date of last transaction as required by the AML/CTF Act. Securely destroyed by shredding (physical) or irreversible deletion (digital) after	Disclosed to AUSTRAC under mandatory reporting obligations. May be disclosed to VGCCC or LCV during inspections or investigations. Disclosed to gaming system providers under data	No



<p>minimisation principles: only information required by law is collected; copies retained only where legally mandated.</p>			<p>retention period expires.</p>	<p>processing agreements where operationally necessary.</p>	
<p>Banking and payment information (e.g., BSB, account number) collected for processing gaming payouts or prize disbursements.</p>	<p>Directly from the individual at point of payout request; via gaming or TITO system records</p>	<p>To process gaming payouts, prize disbursements and, where applicable, report transactions to AUSTRAC under AML/CTF obligations. Retained for 7 years in accordance with AML/CTF Act requirements.</p>	<p>Used only to process the specific payout transaction and meet associated legal obligations. Stored in encrypted gaming management system with restricted access.</p>	<p>May be disclosed to AUSTRAC as required by mandatory reporting obligations. Disclosed to the gaming system provider (including TITO system) under data processing agreements. May be disclosed to VGCCC during inspections.</p>	<p>No</p>



NEWSLETTER					
Type of Personal Information	How Collected	Why Collected	How Used	How Disclosed	Overseas Disclosure
Name, contact details	Online Flemington News Subscription Data Capture Form	To promote VRC news and events	To notify subscribers of news and events. Subscribers can unsubscribe using the link in each communication or by contacting VRC using the details in this policy. You have the right to opt out of direct marketing at any time — see opt-out notice above.	May be disclosed to our local web host.	Not unless otherwise stated



## Appendix 2: Privacy Complaint Form

This form will assist you to make a complaint about the handling of your personal information under the Applicable Privacy Laws.

- We can only consider complaints made about an individual's personal information from the individual themselves (or an authorised representative of that individual).
- Any information collected on this form may be used or disclosed for the purposes of the investigation process but only if it is relevant to the complaint.
- Allegations made about a third person's actions may be put to them.
- Write clearly so that we can get a full understanding of the issue and we are able to contact you.
- If you need to ask any questions about privacy or the complaints process, contact VRC's Privacy Officer by phone on 03 8378 0888 (for individuals in Australia) or by email at [privacy@vrc.net.au](mailto:privacy@vrc.net.au) (for all individuals).

### *Complainant*

Prefix	
Full name	
Registered Address	
Contact number	
Email	

### *Authorised Representative (if applicable)*

Prefix	
Full name	
Relationship to Complainant	

### *About the Issue*

What happened? (Include, where applicable: when and where it happened; dates and how you discovered the alleged use; details of anyone involved; what action you would like VRC to take)



## *Supporting Documentation*

Are there any documents that you can give us that may help us investigate?

Attachment 1	
Attachment 2	
Attachment 3	

## *Lodge Your Complaint*

Email: [privacy@vrc.net.au](mailto:privacy@vrc.net.au)

Post: Private & Confidential

The Privacy Officer

Victoria Racing Club Limited

448 Epsom Road Flemington VIC 3031

## *Signatures*

Complainant signature	Date:    /    /
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Representative's Signature	Date:    /    /
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