



PENRITH RUGBY LEAGUE CLUB LTD

1. We respect your privacy

1.1. PENRITH RUGBY LEAGUE CLUB LTD (Panthers, we, us, our) respects your right to privacy and is committed to safeguarding the privacy of our customers and website visitors. This policy sets out how we collect and treat your personal information.

1.2. We adhere to the Australian Privacy Principles contained in the Privacy Act 1988 (Cth) and to the extent applicable, the EU General Data Protection Regulation (GDPR).

1.3. “Personal information” is information we hold which is identifiable as being about you. This includes information such as your name, email address, identification number, or any other type of information that can reasonably identify an individual, either directly or indirectly.

1.4. You may contact us in writing at **123 Mulgoa Rd, Penrith, New South Wales, 2750** for further information about this Privacy Policy.

2. What personal information is collected

2.1. PENRITH RUGBY LEAGUE CLUB LTD will, from time to time, receive and store personal information you submit to our website, provide to us directly or give to us in other forms.

2.2. You may provide basic information such as your name, phone number, address and email address to enable us to send you information, provide updates and process your product or service order.

2.3. We may collect additional information at other times, including but not limited to, when you provide feedback, when you provide information about your personal or business affairs, change your content or email preference, respond to surveys and/or promotions, provide financial or credit card information, or communicate with our customer support.

2.4. Additionally, we may also collect any other information you provide while interacting with us. For example, if you access our websites, we may collect your Internet Protocol (IP) address, browser type, date and time of your request; your internet service provider, mobile carrier, or data services provider; We may also collect information about your online behaviour, such as information on the pages you visit, links you click, features you use, how and when you interact with the services or the content, images and advertisements you select, website visited immediately before coming to our site, etc. This information is used in an aggregated manner to analyse how people use our site, such that we can improve our service.

Sensitive Information

2.5 It may be necessary in some circumstances for us to collect some types of sensitive information about you, for example in order to provide certain services to you. Sensitive information includes information about a person’s race, sexual orientation, disability, ethnic origin, political opinions, health, religious or philosophical beliefs, biometric information used for automated biometric verification or identification purpose, biometric templates and criminal record. We will only collect sensitive information where:

- we have obtained your consent and the information is reasonably necessary for one or more of our functions or activities;
- we are required to do so under a law that applies to our business; or
- we are otherwise permitted by law to do.

Indirect Collection

2.6 In the course of handling and resolving a complaint, data breach notification, review or an investigation, we may collect personal information (including sensitive information) about you indirectly from publicly available sources or from third parties such as:

- your authorised representative (if you have one);
- applicants, complainants, respondents to a complaint, investigation, application or data breach notification or the third parties' employees and witnesses.

Facial Recognition Technology

2.7 We will also use Facial Recognition Technology ('FRT') in our venues and premises to collect your biometric information such as facial image for following purposes:

- verifying whether you are an excluded person or a person whom we may otherwise lawfully deny access to the premises. If we identify such a person we may exclude or remove them from our premises in accordance with our policies and/or our legal and regulatory obligations;
- complying with any applicable law and regulation, for example, seeking to prevent illegal or undesirable activities such as Anti-money Laundering and Counter-terrorism Financing;
- to otherwise assist law enforcement.

2.8 This use of FRT will be in addition to our use of CCTV surveillance.

2.9 Facial images collected through CCTV surveillance, from FRT cameras or from law enforcement bodies, and faceprints derived from those images, may be stored and compared for the above purposes;

2.10 Our use of FRT will be made available to patrons in the form of appropriately visible signs at our venues and premises. **By entering into our venues and premises, you consent to the collection and use of your personal information in these ways.**

3. How we collect your personal information

3.1. PENRITH RUGBY LEAGUE CLUB LTD collects personal information from you in a variety of ways, including when you interact with us electronically or in person, when you access our website and when we engage in business activities with you. We may receive personal information from third parties. If we do, we will protect it as set out in this Privacy Policy.

3.2 We may from time to time use cookies on our website. Cookies are very small files which a website uses to identify you when you come back to the site and to store details about your use of the site. Cookies are not malicious programs that access or damage your computer. Most web browsers automatically accept cookies, but you can choose to reject cookies by changing your browser settings to reject all cookies before accessing our website. However, this may prevent you



from taking full advantage of our website. Our website may from time to time use cookies to analyses website traffic and help us provide a better website visitor experience. In addition, cookies may be used to serve relevant ads to website visitors through third party services such as Google AdWords. These ads may appear on this website or other websites you visit.

3.3. By providing us with personal information, you consent to the supply of that information subject to the terms of this Privacy Policy.

4. How we use your personal information

4.1. PENRITH RUGBY LEAGUE CLUB LTD may use personal information collected. However, if you withhold your personal information, it may not be possible for us to provide you with our products and services or information about our products and services, or for you to fully access our website. We may also make you aware of new and additional products, services and opportunities available to you.

4.2. PENRITH RUGBY LEAGUE CLUB LTD will use personal information only for the purposes that you consent to. This may include to:

- a) provide you with products and services during the usual course of our business activities; administer our business activities;
- b) manage, research and develop our products and services;
- c) provide you with information about our products and services;
- d) communicate with you by a variety of measures including, but not limited to, by telephone, email, social media, SMS or mail;
- e) • investigate any complaints;
- f) Identification;
- g) Collection and use of the physical location of your mobile device for security purposes, to provide you with specific services and to provide you with alerts, notifications and other information related to our product and services (we may collect this information through our free Wi-Fi network or through the Bluetooth functionality on your mobile device. To opt-out, disable Wi-Fi and Bluetooth on your mobile device);
- h) Obtaining a credit report or other information from a credit reporting agency or financial services provider to assess an application for a gaming or credit related service made by you;
- i) For analytics purposes to develop our understanding of our customers and the market in which we operate;
- j) Employment of our personell and engagement of contractor and sub-contractors;
- k) To administer and manage the ownership of Panthers's shares;
- l) To effect corporate transactions, e.g. sale of a substantial part of our business, merger, consolidation or asset sale of an asset or transfer in the operation thereof of Panthers;

- m) To seek to prevent illegal or undesirable activities;
- n) To comply with obligations that we have under laws that apply to our business or to meet reasonable requests from regulatory bodies which regulate our business, such as implementing incident logs and monitoring the responsible provision of gaming services in our venues and premises, including the exclusion of persons from our venues and premises;
- o) To comply with any other legal requirements such as a law, regulation, court order, subpoena, warrant, legal proceedings or in response to a law enforcement agency request; and
- p) To otherwise assist law enforcement.

4.3. If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law our user databases, together with any personal information and non-personal information contained in those databases.

5. Disclosure of your personal information

5.1. PENRITH RUGBY LEAGUE CLUB LTD may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this Privacy Policy.

5.2 We may disclose your personal information to organisations external to Panthers for them to assist us:

- a) to provide, manage or administer the products and services we offer;
- b) to analyse data to provide insight into our business practices; and
- c) to collect outstanding debts.

5.3 We may share your personal information with another organisation in respect of potential or threatened legal proceedings or disputes (whether between you and that organisation or between us and that organisation), including for the purposes of obtaining legal advice, or to take appropriate action in relation to suspected unlawful activity or serious misconduct, including investigating any such alleged activity.

5.4. If we disclose your personal information to organisations outside of Panthers, (for example, where we employ data processors to process personal information on our behalf), we require, where practicable, that such organisations comply with the requirements under this Privacy Policy and the Australian Privacy Principles. We also require that such organisations have adequate technical measures in place to protect personal information against unauthorised use, loss and theft.

6. General Data Protection Regulation (GDPR) for the European Union (EU)

6.1. PENRITH RUGBY LEAGUE CLUB LTD will comply with the principles of data protection set out in the GDPR for the purpose of fairness, transparency and lawful data collection and use.

6.2. We process your personal information as a Processor and/or to the extent that we are a Controller as defined in the GDPR.

6.3. We must establish a lawful basis for processing your personal information. The legal basis for which we collect your personal information depends on the data that we collect and how we use it.

6.4. We will only collect your personal information with your express consent for a specific purpose and any data collected will be to the extent necessary and not excessive for its purpose. We will

keep your data safe and secure.

6.5. We will also process your personal information if it is necessary for our legitimate interests, or to fulfil a contractual or legal obligation.

6.6. We process your personal information if it is necessary to protect your life or in a medical situation, it is necessary to carry out a public function, a task of public interest or if the function has a clear basis in law.

6.7. It may be necessary in some circumstances for us to collect some kinds of sensitive information about you, for example in order to provide certain services to you. Sensitive information includes personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. We will only collect sensitive information from you if:

- we have obtained your explicit consent.

6.8. You must not provide us with your personal information if you are under the age of 16 without the consent of your parent or someone who has parental authority for you. We do not knowingly collect or process the personal information of children.

7. Your rights under the GDPR

7.1. If you are an individual residing in the EU, you have certain rights as to how your personal information is obtained and used. PENRITH RUGBY LEAGUE CLUB LTD complies with your rights under the GDPR as to how your personal information is used and controlled if you are an individual residing in the EU

7.2. Except as otherwise provided in the GDPR, you have the following rights:

- (a) to be informed how your personal information is being used;
- (b) access your personal information (we will provide you with a free copy of it);
- (c) to correct your personal information if it is inaccurate or incomplete;
- (d) to delete your personal information (also known as "the right to be forgotten");
- (e) to restrict processing of your personal information;
- (f) to retain and reuse your personal information for your own purposes;
- (g) to object to your personal information being used; and
- (h) to object against automated decision making and profiling.

7.3. Please contact us at any time via the contact method in clause 1.4 to exercise your rights under the GDPR at the contact details in this Privacy Policy.

7.4. We may ask you to verify your identity before acting on any of your requests.

8. Hosting and European Data Transfers

8.1. Information that we collect may from time to time be stored, processed in or transferred between parties or sites located in countries outside of Australia. These may include, but are not limited to the United States of America.

8.2. We and our other group companies have offices and/or facilities in Australia. Transfers to each of these Countries will be protected by appropriate safeguards, these include one or more of the following: the use of standard data protection clauses adopted or approved by the European Commission which you can obtain from the European Commission Website; the use of binding corporate rules, a copy of which you can obtain from PENRITH RUGBY LEAGUE CLUB LTD's Data Protection Officer.

8.3. The hosting facilities for our website are situated in Australia. Transfers to each of these Countries will be protected by appropriate safeguards, these include one or more of the following: the use of standard data protection clauses adopted or approved by the European Commission which you can obtain from the European Commission Website; the use of binding corporate rules, a copy of which you can obtain from PENRITH RUGBY LEAGUE CLUB LTD's Data Protection Officer.

8.4. Our Suppliers and Contractors are situated in Australia. Transfers to each of these Countries will be protected by appropriate safeguards, these include one or more of the following: the use of standard data protection clauses adopted or approved by the European Commission which you can obtain from the European Commission Website; the use of binding corporate rules, a copy of which you can obtain from PENRITH RUGBY LEAGUE CLUB LTD's Data Protection Officer.

8.5. You acknowledge that personal data that you submit for publication through our website or services may be available, via the internet, around the world. We cannot prevent the use (or misuse) of such personal data by others.

9. Security of your personal information

9.1. PENRITH RUGBY LEAGUE CLUB LTD is committed to ensuring that the information you provide to us is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

9.2 The transmission and exchange of information is carried out at your own risk. We cannot guarantee the security of any information that you transmit to us, or receive from us. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that personal information that we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

9.3 We have put in place measures for dealing with any personal information breach that we suspect and will inform you and any relevant regulator of a breach where we are required to do so, in accordance with law.

10. Access and correcting your personal information

10.1. You may request details of personal information that we hold about you in accordance with the provisions of the Privacy Act 1988 (Cth), and to the extent applicable to the EU GDPR. If you would like a copy of the information which we hold about you, please email us at information@panthers.com.au.



10.2 If you believe that any information we hold on you is inaccurate, out of date, incomplete, irrelevant or misleading, please email us at information@panthers.com.au.

10.3. We reserve the right to refuse to provide you with information that we hold about you, in certain circumstances set out in the Privacy Act or any other applicable law.

11. Complaints about privacy

11.1. If you have any complaints about our privacy practices, please feel free to send in details of your complaints to information@panthers.com.au. We take very seriously and will respond shortly after receiving written notice of your complaint.

12. Changes to Privacy Policy

12.1. Please be aware that we may change this Privacy Policy in the future. We may modify this Policy at any time, in our sole discretion and all modifications will be effective immediately upon our posting of the modifications on our website or notice board. Please check back from time to time to review our Privacy Policy

13. Third party sites

13.1 Our site may from time to time have links to other websites not owned or controlled by us. These links are meant for your convenience only. Links to third party websites do not constitute sponsorship or endorsement or approval of these websites. Please be aware that PENRITH RUGBY LEAGUE CLUB LTD is not responsible for the privacy practices of other such websites. We encourage our users to be aware, when they leave our website, to read the privacy statements of each and every website that collects personal identifiable information.

14 Disclosure Overseas

14.1 For international guests, we may share your personal information overseas with your agents and/or representatives (including, but not limited to your tour operator or arranger and their representatives) in your country of origin or in Hong Kong, Macau or Singapore, as the case may be.

14.2 When we disclose personal information overseas we will take reasonable steps to ensure that the overseas entity complies with the Australian Privacy Principles¹, unless an exception applies under those principles such that we are not required to do so.

¹ A copy of the Australian Privacy Principles can be accessed via this link: <https://www.oaic.gov.au/privacy/australian-privacy-principles>