

Entain New Zealand Limited – Privacy Policy

This policy governs the use of your personal information by Entain New Zealand Limited “**Entain NZ**”, a delegate of TAB New Zealand. Entain NZ operates brands TAB and betcha and collects your personal information for both these brands. Entain NZ is referred to in this policy as “**we**”, “**us**”, and “**our**”.

Your privacy rights

1. We must comply with our obligations under the Privacy Act 2020 (**Privacy Act**) when dealing with your personal information. Any personal information you provide to us will be stored, used, and disclosed by us in accordance with this Privacy Policy.
2. If you have any questions regarding our Privacy Policy or wish to access or amend the personal information that we hold about you, please contact us at:

PO Box 38899
Wellington Mail Centre
Wellington, 5045 New
Zealand

Email: helpdesk@tab.co.nz

Acceptance of this Privacy Policy

3. You accept this Privacy Policy, and authorise the collection, use, disclosure, storage and retention of your personal information by us as described in this Privacy Policy when you interact with us or use our services.

Amendment of this Privacy Policy

4. This Privacy Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and the changing business environment. We may amend and update this Privacy Policy from time to time by posting a revised version on our Websites. Any amendments will be effective immediately from the date they are posted.

What kinds of personal information does Entain NZ collect?

5. In general, and depending upon the nature of your connection with Entain NZ, the type of personal information we collect may include (but is not limited to):
 - (a) personal details (including but not limited to name, date of birth, gender, and contact details such as address, email address, and telephone number);
 - (b) identity verification information;
 - (c) recordings of telephone calls and records of written correspondence or other communications we have with you;
 - (d) records of your Website or App activity (including but not limited to deposit, withdrawal, or betting transactions);
 - (e) financial information (including but not limited to bank account numbers, credit card information, or debit card information);
 - (f) activity preferences;

- (g) information from your computer or device in relation to your use of the Websites or Apps (including but not limited to IP address, activity logs, cookie and browser identifiers and location identifiers);
- (h) health information for the purpose of health and safety and to enable us to make informed health and safety decisions;
- (i) your appearance; and
- (j) information we create in the course of our relationship with you, such as details or evaluations of your interactions with us.

6. In some cases, if personal information we request is not provided, we may not be able to supply some or all of our products and/or services to you.

When Entain NZ collects personal information

- 7. We collect personal information in different ways, but most of this information we collect directly from you. For example, when you:
 - (a) interact with us – including via phone or teleconference, by letter, email, SMS, online messaging, on social media, or in person;
 - (b) open and operate an account with us under an Entain NZ brand (**Account**);
 - (c) access, browse, view, or use our websites (**Websites**);
 - (d) access, browse, view, or use our apps (**Apps**);
 - (e) place bets with us;
 - (f) visit TAB branded venues (including, but not limited to, stores, pubs, clubs, and race tracks);
 - (g) participate in our competitions and promotions; and
 - (h) otherwise provide us with any of your personal information.
- 8. The law sometimes requires us to collect your personal information, for example under:
 - (a) the *Racing Industry Act 2020* (including to ensure you are old enough to place bets, and for harm minimisation purposes); and
 - (b) the *Anti-Money Laundering and Countering Financing of Terrorism Act 2009* (including to prove your identity).
- 9. Entain Group Pty Ltd (**Entain AU**) may collect personal information from you on our behalf and as our agent. Such information will be treated by us and Entain AU on our behalf in accordance with this privacy policy. Personal information collected by Entain AU will not include identity verification information for the purposes of compliance with the *Anti-Money Laundering and Countering Financing of Terrorism Act 2009*. We will collect such information from you directly.
- 10. You agree that we can also collect your information from third parties. These third parties include:

- (a) people or organisations that run TAB branded venues (including, but not limited to, stores, pubs, clubs, and race tracks);
- (b) other organisations involved in racing and sports betting, including the Racing Codes and the Racing Integrity Board;
- (c) service providers who help us provide our services and operate our business, including but not limited to banks;
- (d) organisations who regulate our business, including but not limited to the Ombudsman, the Office of the Privacy Commissioner, the New Zealand Commerce Commission, and the Department of Internal Affairs;
- (e) public sources; and
- (f) any other third party that the law permits us to collect information from.

11. If you have provided us with information about another person, you warrant that you are not prohibited by law in doing so. Your obligations under privacy laws may require you to seek permission from the person and/or may mean that you need to tell that person about the disclosure and let them know that they have a right to access their personal information and that we will handle their personal information in accordance with this Privacy Policy.

12. When you use our Websites and Apps, we may collect information that is sent to us by your computer, mobile device or other access device, including – your device ID, device type, IP address, geo-location, computer and connection information, referral URL, statistics on page views, traffic to and from our Websites and Apps. Generally, this information is not personally identifiable data, but to the extent that it is considered personal information for the purposes of any applicable law or regulation, we will comply with our obligations under any such law or regulation when processing that information.

How Entain NZ uses personal information

13. We collect personal information to:

- (a) provide you with our services;
- (b) assess your credit worthiness;
- (c) confirm that your Account is being used in accordance with our General Terms and Conditions for Accounts (and, in particular, that your Account is being used solely for the purposes of betting with us under an Entain NZ brand), as well as the Special Terms for Internet Betting (if applicable) and the Betting Rules;
- (d) provide you with Account related support, notifications, reminders and offers (including Account deposit, Account withdrawal, Account balance and Account activity) during the establishment and on-going use of your Account;
- (e) manage your Account and assess your eligibility to receive specific products and services;
- (f) offer you products or services that we consider may be of interest to you;
- (g) manage our relationship with you and with people or organisations that run TAB branded venues (including, but not limited to, stores, pubs, clubs, and race tracks);

- (h) assess your eligibility for participation in any promotional events which Entain NZ may be running;
- (i) deal with your requests, enquiries or complaints and other customer related activities;
- (j) carry out market research and analysis relating to Entain NZ and Entain AU's products and services generally;
- (k) to manage our, and Entain AU's, business and services generally;
- (l) monitor Account activity in order to detect and prevent actual or suspected corruption in sport and racing;
- (m) to identify, prevent or investigate any actual or suspected fraud, unlawful activity, misconduct or threats to our system, to keep our Websites and Apps secure, and for investigation purposes;
- (n) comply with our obligations under applicable laws, including but not limited to problem gambling, harm prevention and minimisation under the *Racing Industry Act 2020* and requirements, including identity verification requirements, under the *Anti-Money Laundering and Countering Financing of Terrorism Act 2009*;
- (o) to comply with any legal obligations or as otherwise permitted by the Privacy Act; and
- (p) subject to you providing your consent (in accordance with the *Unsolicited Electronic Messages Act 2007*), sending you electronic messages to promote and market our services including any promotions.

14. We can also compare and combine any personal information we hold about you with any publicly available information about you, for the purposes set out above.

15. Where you consent to us using your personal information for marketing and promotional communications, you can opt out at any time by notifying us at helpdesk@tab.co.nz or by clicking the unsubscribe function included in our marketing communications.

Who we may disclose your personal information to

16. We may disclose your personal information:

- (a) for the purpose for which it was collected (or a purpose that is directly related to the purpose in connection with which the information was obtained);
- (b) to the third parties that we can collect your personal information from, as set out in paragraph 10 above, or that provide services to us, and such third parties will provide the same or equal protection to your personal information as this Privacy Policy;
- (c) courts, tribunals, and regulatory authorities for the purposes of investigating and/or detecting breaches of the Rules of Racing of New Zealand or of any other jurisdiction, or any relevant legislation of New Zealand or of any other jurisdiction;
- (d) any other person or organisation that you have authorised us to disclose your personal information to;
- (e) any other person or organisation that we are permitted or required to disclose your personal information to by law; and

(f) to Entain AU for its own business purposes. However, information provided by you solely for the purposes of the *Anti-Money Laundering and Countering Financing of Terrorism Act 2009* will be held and processed by Entain AU solely on behalf of Entain NZ and will not be used by Entain AU for its own business purposes. Entain AU may also disclose your personal information as set out in this clause 16.

Where we hold your personal information

17. Your personal information will be transferred to, and stored by, Entain AU outside of New Zealand. Certain personal information may also be transferred and/or stored outside of New Zealand by our third party service providers. Where personal information is transferred outside of New Zealand we will ensure that such third party is subject to comparable privacy laws to New Zealand or is required to protect the personal information in a way that is comparable to New Zealand's privacy laws.

Access, correction, and retention of your personal information

18. You agree that any information you give to us will be accurate, correct and up to date.

19. You must inform us if any of your personal information changes, to ensure that the details we hold about you are up to date and correct.

20. Subject to the exceptions set out in the Privacy Act, you are entitled to access the personal information we hold about you, and to request that we amend it if it is incorrect. If we are not willing to correct errors that you have identified in your personal information, you may request that we take reasonable steps to attach a statement to the personal information noting the correction sought.

21. We will only retain your personal information for as long as it is required to achieve the purposes set out in this Privacy Policy or as otherwise required by law. Where we no longer require your personal information, we will use reasonable endeavours to comply with our legal obligations in respect of that information, such as securely destroying such personal information.

Security of information

22. We take reasonable steps to protect personal information held by us from misuse, loss and unauthorised access, modification or disclosure, including through the use of technical and physical security measures.

23. Although we take reasonable steps to ensure personal information held by us (or on our behalf) is protected and held securely, we do not make any warranties in relation to the security of any information you disclose or transmit to us and we are not responsible for the theft, destruction, or inadvertent disclosure of your personal information where our security measures have been breached. Any transmission of personal information is conducted at your own risk.

Links to other sites

24. We may have links or references to other websites from our Websites and our Privacy Policy does not apply to those websites. We take no responsibility for the privacy practices of other websites.

Cookies

25. The Websites use cookies to deliver a more personalised experience to users. A cookie is a small text file that is stored on your device when you access a website. Cookies are sent back to the Websites on each subsequent visit allowing us to identify and interact with your device.

26. By using our Websites with cookies enabled you consent to cookies being used by us and Entain AU, but not exclusively, for:

- (a) allowing users to log into their Account;
- (b) monitoring and collecting information in respect of bets placed on the Websites;
- (c) analysing trends and broad demographic information for optimisation of the Websites;
- (d) facilitating market research and promotional activities;
- (e) measure the effectiveness of our marketing initiatives; and
- (f) learn about your preferences so that we can present you with web content and advertising that is relevant to you.

27. You can switch off cookies by adjusting your browser settings.

Address details of Entain NZ

28. The address of Entain NZ, as the agency collecting and holding your personal information, is:

PO Box 38899
Wellington Mail Centre
Wellington, 5045
New Zealand