

PRIVACY POLICY

OUR COMMITMENT TO PRIVACY

1. At Entain, we take privacy and customer service seriously. We attach great importance to safeguarding customer personal information. We consider our Privacy Policy to be an important document. We hope that you take the time to read it.
2. Our Privacy Policy outlines the commitment of Entain Group Pty Ltd (ACN 151 956 768) and its Subsidiaries ("Entain" or "we", "us" or "our") to protect the privacy of our customers' personal information and other personal information we receive in the conduct of our business.
3. This privacy policy applies to our customers in Australia and New Zealand. For privacy policies applicable to the operations of our affiliated companies in other countries, please refer to those country-specific privacy policies located on the websites of our affiliated companies.
4. This privacy policy applies to our Australian websites and Apps but does not apply to linked third party websites and Apps that we do not operate.
5. This privacy policy also applies to job applicants. We have a separate Staff Privacy Policy for employees and contractors. If you are an employee or contractor and would like a copy of the Staff Privacy Policy, please email privacy@entaingroup.com.au
6. We comply with all relevant privacy laws, including the requirements applicable to us under the Australian Privacy Act 1988 (Privacy Act) and relevant State laws.

OUR PRIVACY POLICY

7. Our Privacy Policy sets out how we look after personal information. It explains the kinds of personal information that we collect, and why we collect it. It also describes how we hold, use, and disclose personal information.
8. When you create a customer record with us, you agree to the terms of our Privacy Policy.
9. By using our websites and Apps, opening an account or by providing personal information to us, you also agree to the terms of our Privacy Policy.
10. When you agree to the terms of our Privacy Policy, you consent to the collection, use, storage and disclosure of that information as described in our Privacy Policy.

THE PERSONAL INFORMATION THAT WE COLLECT

11. We collect personal information in the provision of our products and services, including the marketing of our products and services. We collect personal information so that we can provide these products, services and information to our customers.
12. We also collect information where we are required to do so by law, including pursuant to the *Anti-money Laundering and Counter Terrorism Financing Act 2006* (Cth), or as a condition of our licenses.
13. The types of personal information we collect depends on the circumstances in which the information is collected.
14. The types of personal information we collect may include:
 - Your name and contact details
 - Identification details, such as date of birth
 - Identification verification information, such as your passport or drivers licence information that you provide to us to verify your identity
 - Information regarding your use of our products and services
 - How you make payments to us, and how we make payments to you, such as your banking and payment details. This could include bank account and debit or credit card details.
 - Your betting history with us
 - Records of communications and dealings with you, such as emails, SMS, telephone, live chat and in-person communications
 - Information regarding your use of our websites and Apps
 - Location information
 - Financial information, including information about your financial circumstances and source of income
 - Information we may collect as part of a survey, customer feedback request or a competition
 - Information that you provide to us, for example, for verification or as evidence in respect of a complaint
 - Information and opinions about you that are provided to us by others, such as banks and regulators
 - If you apply to work for us: Your resume, information about your past work and study, references and police background checks.

15. We collect information about people who are our suppliers and business partners, or who are employed by our suppliers and business partners. The information we collect is that which we need to do business with that party.
16. We collect information about people who visit our offices and attend our events. This may include photographs and video.
17. We may record and monitor telephone calls and other communications between you and us for training, quality control, verification and compliance purposes.
18. When you communicate with us, we may collect additional information including the languages you speak and how best to manage communications with you.

ONLINE SERVICES

19. When using our online services, including our websites and Apps, we and our technology partners may collect information about you and how you use our online services.
20. We may collect information such as:

- user name and password
- which services you use and how you use them
- device information, such as the model and ID of the device you use, operating system, telephone number and mobile phone network
- server log information, such as details of how you used the service, IP address, hardware settings, browser type, browser language, the date and time of your use and referral URL
- information that may uniquely identify your browser or your account
- location information.

21. If you visit our website or use our Apps, we collect information on your use of the website or App, such as pages visited, links clicked, text entered, and mouse or cursor movements, as well as information more commonly collected such as the referring URL, browser, device, operating system, and Internet Protocol ("IP") address. We may use publicly available sources to approximate your geographic region and Internet Service Provider based on your IP address.

22. We use various technologies to collect and store information, including cookies, pixel tags, local storage, such as browser web storage or application data caches, databases, and server logs. These technologies help us track your usage and remember your preferences.

23. For example, cookies are small files that store information on your computer browser, TV, mobile phone or other device. Cookies enable the entity that placed the cookie to recognise you across different websites, services, devices and browsing sessions. If you choose, you can set your browser to reject cookies or you can manually delete individual cookies or all of the cookies on your computer by following your browser's help file directions. Turning off cookies may also disable functions of many websites you visit. You can disable cookies but our online services may not work as intended if you do so.

24. Our online services may contain links to other websites. We are not responsible for the privacy practices or the content of other websites. The privacy practices applicable to other websites may differ substantially from ours. Please read the privacy policy of any other websites you visit before using them.

25. We do not accept responsibility for the content or practices of websites operated by third parties that are linked to from or that link to our websites.

SENSITIVE INFORMATION

26. Sensitive information includes information about your health, racial or ethnic origin, religious beliefs and criminal record.

27. Usually, we don't collect sensitive information. If we need to do so, we will only collect sensitive information about you with your consent and where it is reasonably necessary for us to do so, or if we are otherwise allowed or required by law to collect that information. If you provide us with sensitive information, we will consider that you have consented to us collecting it.

HOW WE COLLECT PERSONAL INFORMATION

28. Personal information is collected in a number of ways, including:

- directly from you, for example, when you give it to us, when you enter your personal details on our websites or Apps, when you create a customer record, open an account or update your details, when

you place a bet with us, when you complete an entry form for a competition or participate in a survey, or when you apply to work for us

- when you use our products or services, including from your use of our websites and Apps
- when you email, text or telephone us, engage in live chat or when you share information with us from other social applications, services, websites or Apps
- when you interact with our websites, Apps, online content and advertising
- when you visit our offices or attend our events, for example, you may be photographed or captured on CCTV
- from publicly available sources of information, including third parties from whom we may acquire lists
- from third parties, such as banks, regulators, payment channel providers or your family members
- from background check providers, former employers, referees, and educational institutions, if you apply to work for us.

29. If you choose not to provide us with information, we may be unable to supply products or services to you.

USE OF PERSONAL INFORMATION

30. We may use and disclose your personal information for the following purposes:

- to provide our products and services to you
- to identify you and to assist you to obtain and use our products and services, including to comply with our "Know your Customer" obligations under the *Anti-money Laundering and Counter Terrorism Financing Act 2006* (Cth)
- to consider your eligibility for our products and services
- to administer and manage our services including opening and the ongoing settlement of your wagering account
- to complete transactions with you
- to respond to inquiries from you
- to provide you with customer support
- to monitor and detect possible fraud or breaches of our terms and conditions of service, including to comply with our transaction monitoring obligations under the *Anti-money Laundering and Counter Terrorism Financing Act 2006* (Cth)
- to ensure that our products and services are used in a legal and responsible manner
- to ensure that you and your account with us complies with all relevant laws and your contractual obligations to us
- to conduct appropriate checks to detect fraud
- to process payments
- to improve our products and services
- to conduct research
- for security purposes, including to perform functions that we believe are necessary to protect the security and proper functioning of our websites and Apps
- to comply with our legal obligations, resolve disputes, and enforce agreements
- to investigate or pursue a legal claim
- to administer surveys, contests, or other promotional activities or events sponsored or managed by us or our business partners
- to make special offers related to our products and services
- to gain an understanding of your needs to provide you with better and more personalized products and services tailored to your requirements
- to promote and market our products
- to assist in the enforcement of laws, including the *Anti-money Laundering and Counter Terrorism Financing Act 2006* (Cth)
- to report to our directors and shareholders
- to maintain and update our records
- to determine whether to hire you to work for us
- as otherwise required or authorised by law

DIRECT MARKETING & UNSUBSCRIBE

31. We may use and disclose your personal information to carry out consumer, market, community and product research, compile demographics and perform other analysis so that we can develop and implement initiatives to improve our products and services.

32. We may use and disclose your personal information for marketing purposes. To communicate account and promotional information to you, you may be contacted by us via a number of means including e-mail, SMS and phone communications, push notifications, social media posts or chats, hardcopy mail and other means. Should you not wish to receive marketing communications of this nature, you may unsubscribe or opt-out:

- by following the link or instructions in the communication
- by contacting our Customer Service team to update your communication preferences
- by changing the marketing preference settings for your account in our App.

33. If you unsubscribe from marketing communications, this will not stop you receiving service-related communications from us if we are otherwise legally entitled to send them to you. In some circumstances, if your account is closed or inactive for a period of time, we will stop communications with you.

DISCLOSURE OF PERSONAL INFORMATION

34. We may disclose your personal information:

- to and between our Subsidiaries and our related bodies corporate, including where we share resources between those companies in order to create efficiencies in our operations and improve the delivery of the services we provide to you;
- to government agencies, regulators and law enforcement bodies
- to AUSTRAC, in order to comply with our obligations under the *Anti-money Laundering and Counter Terrorism Financing Act 2006* (Cth)
- to insurance companies
- to racing and sporting bodies
- to a court or tribunal
- to anyone who acquires or considers acquiring our assets or business (or part of it)
- to a person who serves us with a subpoena or other legal document requiring us by law to disclose information or documents about you to them
- to our consultants, contractors, subcontractors, suppliers, service providers and professional advisors, who assist us in operating our business, for example to payment service providers, providers of our Card programs (including EML and Mastercard), companies that provide identification verification services (such as Green ID and Equifax), customer analytics providers, mail house operators, banks, investigators, and organisations that we engage to deal with you on our behalf.

35. Sometimes, we disclose personal information to a third party who has the right to use our brand or logo. The third party may provide products or services, or operate a website or App, but these are not our products, services, websites or Apps.

36. We may disclose your personal information to organisations outside of Australia, including to our related bodies corporate, to contractors, and providers of payment services. The disclosure may be to organisations located in the UK, Austria, New Zealand, Germany, the United States, India and the Philippines.

37. We will take reasonable steps to ensure that any personal information which we disclose to a third party is protected by that party in accordance with the Privacy Act.

ACCESS BY REGULATORY, RACING AND SPORTING BODIES

38. In accordance with the rules of racing and other obligations in various jurisdictions, betting transactions conducted over the Internet and by telephone (including but not limited to telephone calls, as well as transactions to and from an individual's computer) may be observed and recorded by us and by the relevant regulatory, racing or sporting body. Additionally, these bodies may be granted access to review personal information collected by us for reasons including but not limited to ensuring the integrity of racing, sporting and other events. These bodies may not be located in Australia.

DOCUMENT VERIFICATION SERVICE

39. For the purposes of verifying your identification using the Document Verification Service, you confirm that you are authorised to provide the details that you provide to us during the creation of your customer record and identity verification processes. This information is sought and used for the purpose of undertaking

an information match request in relation to relevant Official Record Holder information and that a corresponding information match result will be provided via the use of third party systems. You acknowledge and consent to the use and access of your information in this way.

SECURITY AND STORAGE

40. We may store customer information (including personal information and credit information) in a variety of formats, including electronic or paper formats.
41. We take measures to enhance the security of our websites and Apps. If you are a customer, it is important for you to protect against unauthorised access to your password and to your computer. You should have a unique and complex password and make sure to regularly update your operating system. You should use the latest version of our App. You must not disclose your password to others.
42. We take reasonable steps to ensure that your personal information is stored securely. Transmissions sent to or from our websites and Apps are routinely monitored for quality control and systems administration. We cannot guarantee the total security of any data transmission over the Internet, however, we strive to protect your personal information.
43. A number of physical, administrative, personnel and technical measures are used to protect your personal information, including restricting access to offices, databases and firewalls to keep personal information secure from misuse, loss or unauthorized use.
44. Although due care is taken, we cannot guarantee the security of information provided to us via electronic means or stored electronically. No security measures are perfect and we cannot promise to be able to withstand security threats in all circumstances.
45. Personal information is only retained for as long as is necessary or as required by law pursuant to our data retention and deletion policies. We are subject to data retention obligations at law, including under the Anti-Money Laundering and Counter-Terrorism Financing Act (Cth) 2006 which requires retention of certain data for 7 years. You can request deletion of your personal information by contacting privacy@entaingroup.com.au.

ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

46. You have the right to access, update and correct the personal information that we hold about you.
47. If you would like to access the personal information that we hold about you, please let us know by sending an email to the Customer Service Manager. We will provide you with a copy of your personal information within a reasonable period after the request is made, usually within 30 days. In some cases, we may charge a reasonable fee to provide access to your personal information, but we will never charge you a fee to make a request. If a fee applies, we will advise you before we provide access. Sometimes, we may not be able to provide you with access to all of your personal information and, where this is the case, we will tell you why. We may also need to verify your identity when you request your personal information.
48. We take reasonable steps to ensure the personal information we hold about you is accurate, complete, up-to-date, relevant, and not misleading.
49. If you would like to make an update or correction to any personal information we hold about you, please let us know by sending an email to the Customer Service Manager.
50. If there is a reason for not granting you access to your information or making a correction to any personal information, we will provide you with a written explanation of the reasons for the refusal (unless unreasonable to do so) and inform you of the mechanisms to complain about the refusal.

CREDIT INFORMATION

51. We may have previously collected credit information from you, in order to provide credit services to you. We no longer provide credit or collect credit information.
52. If you have a residual credit account, our previous version of this Privacy Policy (version 9) will continue to apply in respect of your credit information.

FURTHER INFORMATION AND COMPLAINTS

53. For further information, or if you would like to make a complaint about our use, handling or disclosure of your personal information, please contact our Customer Support team or refer your complaints in writing to privacy@entaingroup.com.au. Following receipt of your complaint, we will investigate and respond to you within a reasonable period of time.
54. If you are not satisfied with our response, you may also contact the relevant regulator such as the Australian Information Commissioner. As at the date of this Privacy Policy, the contact details are as follows:

- Office of the Australian Information Commissioner
- GPO Box 5218
- Sydney NSW 2001
- Phone: 1300 363 992
- Email: enquiries@oaic.gov.au
- Online: <https://www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint>

55. If you would like more information about the Privacy Act or Australian privacy requirements in general, please visit the Office of the Information Commissioner's website at www.oaic.gov.au.

CHANGES TO THIS POLICY

56. We regularly review this Privacy Policy and our privacy practices.
57. From time to time, we will change this Privacy Policy. If we do, we will update the Privacy Policy on our websites. The changes will come into effect immediately upon notification on our websites.
58. If the changes are significant, we will aim to provide customers with an email or text notification of the changes.
59. You should check our website from time to time to understand how the current version of our Privacy Policy applies to you.

GENERAL

60. Subsidiary means, in respect of a company, trust or other entity, a subsidiary of that entity within the meaning of the Corporations Act 2001 (Cth) or an entity which is, for the purposes of section 50AA of the Corporations Act 2001 (Cth), under the "control" of that entity, and includes Entain New Zealand Limited and any brands operated by it from time to time.
61. We are proud to operate the following brands in Australia: Ladbrokes and Neds,
62. For privacy policies applicable to operations in other countries where we operate, please refer to those country-specific privacy policies.
63. Last updated on: 27 September 2023
64. Version 13