## **Privacy Statement**

The Lottery Office Affiliates (TLO Affiliates) is a business owned and operated by Global Players Network Pty Ltd, 20 Catterthun Street, Darwin, Northern Territory, Australia, 0821, (GP Network or GPN) and is the official affiliate program for The Lottery Office (<u>https://www.lotteryoffice.com.au/</u>).

This Privacy Policy sets out the principles undertaken by GP Network (The Company) in the management of personal information. The Company is bound by the Australian Privacy Principals set out in the Privacy Act 1988. We will only collect, use or disclose information in accordance with this Act and this Privacy Policy. This Privacy Policy has been appropriately modified where necessary for the specific purposes relative to TLO Affiliates.

# POLICY:

# **Collection of Personal Information**

Whenever it is reasonable and practicable to do so, The Company will only collect information about an individual directly from that individual.

The Company only collects personal information about an individual which is reasonably necessary to:

- Provide an individual with products or services and access to the affiliate program;
- Consider applications and approaches made by an individual to The Company;
- Verify an individual's identity;
- Maintain an individual's contact details;
- Fulfil The Company's legal obligations under applicable laws and rules including for tax purposes; and
- To conduct market research and sales and other marketing activities.

The personal information relating to an individual held by The Company pertains to the affiliate program and any products and services offered by The Company or sought by an individual (e.g. Name, address, contact details (e.g. phone and email), payment method details, etc.).

The Company collects information from individuals via letter, fax, email, web sites and publicly available sources (such as contact details available on the affiliate's website). The Company may have occasion to collect information about the customer from a third party, in accordance with and as allowed by the Privacy Act. For example:

- Market research companies contracted by us to improve our products and services;
- Trade directories and associations to ensure quality assurance.

## **Use and Disclosure**

The Company will only use or disclose personal information for the purpose which was either specified or reasonably apparent at the time of collection. The Company may also use or disclose personal information for any other related purpose for which such information would reasonably be expected to be used, to the extent permitted by the Privacy Act. The personal information of any party contracting with GPN for the provision of services will be collected and used for the purposes of those services as required and for preserving and enforcing the rights of GPN under the provisions of the relevant contract or agreement with that party.

Where and as permitted by the Privacy Act, The Company may also use your personal information to send information that could be of interest to you, such as information relating to the affiliate program or our business, products, services or offers.

The Company does not generally disclose personal information to third parties except, The Company may disclose personal information to other members of affiliated companies, which may only use it as described above, and The Company may also provide customer information to:

- Third parties, such as service providers, engaged by The Company to perform functions on behalf of The Company such as IT service providers, data storage, web-hosting, processing credit card information, mail debt collection, marketing, research, legal compliance, advertising and professional advisors;
- Anyone for whom our business or assets (or any part of them) are, or may be transferred;
- Business partners or vendors in connection with the processing of any promotion, event or service organised by us; or
- Law enforcement agencies and governments worldwide for security purposes and regulatory compliance.

The Northern Territory Government licences the operation of the company and as a condition of that licence has the right to approve service contracts such as affiliate agreements between the company and other parties. In assessing the parties to these contracts the Government may conduct probity and law enforcement checks as well as other investigations into the parties and their principals. The company may release such personal information including trading figures under the affiliate agreement to the Government for this purpose.

Personal data collected within the European Union may, for example, be transferred to and processed by third parties located in a country outside of the European Union. In such instances but subject to any overriding requirement of the Northern Territory Government, the Company shall ensure that the transfer of the personal data is carried out in accordance with applicable privacy laws such as the EU General Data Protection Regulation and, in particular, where appropriate and practical the contractual, technical, and organisational measures are in place such as the Standard Contractual Clauses approved by the EU Commission.

## Security and Storage of Personal Information

The Company is committed to protecting the personal data we collect under this Privacy Policy. We implement appropriate technical and organisational measures to help protect the security of this personal data and ensure such information is accurate and complete. Information is held on secure servers or within controlled environments (e.g. in The Company's offices, on hard drives or with selected third party service providers). Employees of The Company are required to maintain the confidentiality of any personal information held by The Company. The Northern Territory Government also reviews and approves company security control systems.

## Access, Correction and Accountability of Personal Information Retained

Individuals have the right to seek access to and correction of their personal information held by The Company and to advise us of any inaccuracy. There are exceptions to these rights as set out in the Privacy Act, and access may be denied if such an exception applies.

If an individual requests access or correction to information relating to the individual, the Company will ask the individual to verify their identity and specify the nature of their request. The Company may charge a fee to cover the costs of meeting the request, where permitted by the Privacy Act. Any request will be dealt with in a reasonable timeframe.

Individuals in the EU also have a right to have their EU personal information to be expunded, also known as the right to be forgotten. This right is also available on request for such individuals subject to any overriding requirement of the Northern Territory Government.

Information may be obtained or corrected by referring to company contact details on the relevant website or by e-mail to: <u>affiliateinfo@lotteryofficeaffiliates.com</u>

## **Accuracy of Personal Information**

The Company takes reasonable measures to ensure all personal information is accurate, complete and up-to-date, when collected or used. If any information is incorrect, you are encouraged to advise The Company by telephone or in writing.

Customer Service Consultants are trained to confirm and update where necessary, contact details of individuals.

## **Transfer of Personal Information Overseas**

The Company may transfer personal details of customers overseas to fulfill the services requested of The Company, for example:

- To overseas offices of an affiliated company; or
- Internal or outsourced data processors, list brokers, marketing companies.

In the majority of cases the transfer of information is necessary for the fulfillment of company obligations. Unless otherwise advised, we will use reasonable steps to ensure that these overseas entities comply with the Australian Privacy Principles.

#### **Concerns and Complaints**

If an individual has a complaint about a breach of our Privacy Policy, the Privacy Act or any other applicable code, or requires further information about this subject, they can contact The Company:

#### Via e-mail: <u>affiliateinfo@lotteryofficeaffiliates.com</u>

The Company takes any such concerns seriously and will generally respond within 7 business days of receipt. If you are not satisfied with the Company's response, you may contact the office of the Australian Information Commissioner to lodge a complaint at:

https://www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint

Or in writing at:

GPO Box 5218 Sydney NSW 2001

## **Changes to this Privacy Policy**

The Company may, as necessary, review and update this Privacy Policy due to changes in law, technology or business operations. Any changes to the Privacy Policy will be posted to the website and individuals are encouraged to periodically review this Privacy Policy for the latest information on our privacy practices.