

1. PURPOSE

This Privacy Policy has been prepared for the Newcastle Jockey Club Limited (ABN 13 000 002 513) (**NJC, we, us and our**) which is an Australian public company limited by guarantee and operates as a registered thoroughbred race club governed by Racing NSW. The NJC trades under its own name and also under registered business names including 'Newcastle Racecourse'. In this Privacy Policy, references to 'NJC' include all businesses operated by that company.

2. NJC Privacy Policy SCOPE

The NJC respects the right of our individual members, patrons, customers, suppliers and colleagues to decide when and how their personal information is used. We are bound by the *Privacy Act 1988* (Cth) including the Australian Privacy Principles (**APPs**), which regulate how we collect, use, disclose and store personal information.

If at any time you provide us with another person's personal information (e.g. as part of a group booking or guest list), then you must ensure that person has read, understood and separately consented to us processing their personal information in accordance with this Privacy Policy.

What kind of information do we collect and hold?

Information we collect from you:

The information we collect from you when you attend an event at NJC premises (or arranged by us elsewhere), purchase items from us or from other suppliers on NJC premises, purchase tickets from the NJC, complete NJC membership application or renewal forms, arrange a function or event at NJC premises, enter a competition we have advertised or contact us with any other request, query or complaint may include:

- your name;
- your gender;
- postal address;
- email address;
- telephone number(s);
- your school, organisation or community group (in the case of group bookings);
- your occupation;
- your country of residence;
- your age or date of birth;
- credit card or other payment details e.g. Bank account details where supplied
- your identification details such as those in your driver's licence or passport;
- the information you provide us when preparing a membership application along with the content of any declarations made in connection with that application;
- any information you provide us about special requirements (such as access needs, disability or dietary requirements);
- any information you provide to us in enquiries; and
- your image

- identify, exclude, or remove from the premises individuals who we may lawfully deny access to, including “Excluding Persons”, and for other purposes related to wagering, safety and security and preventing illegal or undesirable activities

If you don't provide some or all of this information, we may not be able to provide our services to you effectively or at all, or respond effectively to your request, proposal, query or complaint.

We may also collect your personal information from publicly available sources or from third parties (e.g. from an organisation that makes a purchase, booking or enquiry on your behalf). We may also obtain your personal information from owners, bookmakers, trainers and other suppliers of goods and services wishing to conduct business at the NJC's premises.

Information from our interactions with you:

When you communicate or interact with us such as by telephone or email or by visiting the NJC's premises, we hold information about those interactions. The types of information we store include:

- the history of your enquiries and communications with us;
- information about your NJC membership;
- when you sign up and agree to the terms and conditions for a Wi-Fi network available at our premises, we may collect information including your location within our premises, mobile number and email address;
- the history of the services you supplied us; and
- your booking history.

We may also receive and record information when you visit our website or view our social media accounts from your internet browser, including statistics on page view, date and time you visited the website, traffic to the NJC website, IP address, device data, referral URLs and web log information.

Information from other sources:

We may use social media platforms and other interactive online forums through which we promote and provide our services. We may collect your personal information when you interact with us or mention the NJC in public forums while using platforms such as Facebook, Instagram, Twitter and YouTube.

How do we hold and protect personal information?

Personal details collected by the NJC are stored on secure servers that have protection from unauthorised access. Our security measures are industry standard. We have implemented strict systems and procedures designed to ensure that personal information the NJC holds is protected from misuse, loss, unauthorised access, or modification. We will take all reasonable steps to ensure that the information we hold about you is secure, accurate, complete and up to date. To assist us in keeping personal information up to date, you should contact NJC if any of the information provided to us changes or becomes incorrect.

Where appropriate, NJC's website provides a secure environment by using Secure Sockets Layer (SSL). This establishes a session, and encrypts all traffic, between NJC's web server and the user's browser. Users who choose to access their personal or mobile devices by utilising NJC supplied cables or wireless internet access should note the following information will be recorded:

- IP and MAC addresses;
- connection logs that include time stamps of dates, data usage, source and destination, device name, wireless SSID and membership number;
- type of TCP/IP Protocol used.

NJC will store any credit card details in a secure database but will retain this information for only so long as is necessary to fulfil the immediate purpose for which the information was collected or as required by law.

How do we use your personal information?

The NJC may use your personal information if it is reasonably necessary for the purposes of carrying out our business and operations, including to:

- provide you with information, promotions and announcements that we think may be of interest to you;
- provide you with, and to improve, our products and services;
- undertake surveys in relation to your experience with our products and services;
- process your purchases, bookings, donations and other transactions;
- conduct competitions and other promotions in which you may participate;
- identify who is using our products and services, develop a data profile to enable us to tailor our products and services to you, including to enhance the content of our websites and create aggregate anonymised data (which does not identify you);
- monitor your location while on NJC premises and notify you of events, offers and other products or services that may be of interest to you;
- identify whether certain products or services are being provided to the correct person;
- identify whether you have any particular requirements in relation to products or services we provide;
- facilitate your participation in the NJC's sponsorship and membership programmes;
- raise funds for charitable programmes supported by the NJC; and
- respond to your enquiries or complaints.

You specifically consent to us using your personal information (and sensitive information where necessary) for marketing activities and promotions, including providing newsletters, alerts, advertisements, associated services, public information campaigns and web content we think you might be interested in. In the event you do not wish to receive such marketing and promotions communications, you may opt-out using the unsubscribe mechanism contained in the communication or by contacting us using the contact details at the bottom of this policy.

How we share your personal information:

The NJC may disclose the information we collect from you as follows:

- *Our Affiliates* – we may share your personal information with our affiliated companies;

- *Our business partners* – we may share your personal information with our business partners when we conduct joint promotions with them;
- *Legal Matters & Safety* – we may share your personal information as permitted or required by law, including to provide information to law enforcement or regulatory agencies investigating matters;
- *Our service providers* – we may share your personal information with our service providers so that they can provide their services to us, including marketing services, insurance cover, ticketing services, technology services and data analysis services;
- *Sale or Transfer of Business* – in the event that all or any part of our business is sold or disposed of, whether by sale of assets, merger or otherwise, or in the event of insolvency, your personal information may be an asset sold or merged in connection with that transaction; and
- *With your permission* – we may provide your personal information to any other third party with your consent or as necessary to deliver a service or respond to a request, query or complaint from you.

The NJC takes all reasonable steps, in the circumstances, to ensure that all our service providers do not breach privacy laws in relation to that information and agree to protect the privacy and security of your personal information and use it only for the purpose for which it is disclosed.

International Transfer:

The NJC may disclose or transfer your personal information to our service providers located outside of Australia. This includes the disclosure of personal information on our databases to any service provider we may engage in other countries from time to time.

We will endeavour to ensure that any overseas recipient of your personal information from us will treat that information in accordance with the APPs and will only use that information in accordance with our directions and this Privacy Policy.

Marketing and Communications:

Cookies and Similar Technologies

The NJC uses cookies and similar technologies to provide the website service, direct specific content to you and access your information when you access our websites.

We and our service provider may use cookies and similar technologies to:

- record information about your activity which may include information regarding your computer, device, browser (potentially including your IP address and unique device identifier), browser type, geolocation data and transactional, software and hardware information;
- remember when you logged into our website;
- remember your user choices, preferences, searches and favourites;
- track our marketing campaigns;
- improve our services to website visitors;

- target relevant advertisements to you via third-party ad networks, social media and other online advertising platforms;
- enable social media sharing; and
- tailor our services and make your visits easier, more productive and more efficient.

A cookie is a small data file that contains information about your visit to our website, which can identify your web browser but not you. We do not use cookies to store any sensitive information, such as name, address or contact details.

If you wish to disable or remove cookies, please see the “Help” section of your browser or mobile device. Each browser or device handles the management of cookies differently, so you will need to refer to your appropriate “Help” documentation. Cookies are essential for certain features of our websites to work properly. Without the cookies and similar technologies used on our websites, we may not be able to provide certain services and features and our websites may not perform as smoothly as we would like.

Marketing

The NJC maintains an active marketing program, which is delivered with a view to providing our visitors with relevant information about upcoming events and activities. You specifically consent to us using your personal information for marketing activities and promotions including electronic newsletters, alerts, advertisements, competitions, public information campaigns and web content we think you might be interested in. In the event you do not wish to receive such marketing and promotions communications, you may opt-out using the unsubscribe mechanism contained in the communication or by contacting us using the contact details below.

From time to time, our marketing team may send emails or SMS messages about upcoming events or special offers, including about special deals available during your visit to one of the NJC’s premises. You can choose to opt-in to or opt-out of these communications at any time as outlined below.

Photography

The NJC commissions photographers to attend racedays as well as non-raceday events to photograph the event and general environment at such occasions including images and videos of patrons for the purpose of using them in our promotional material in the future. This professional material may include material on our website, and advertising materials in hard and soft copy. A video or photograph of a patron may amount to personal information and be used for promotional purposes and shared with relevant third-party partners for the purposes of promoting racedays and events held at our premises.

We note that as part of the terms and conditions of entry to NJC premises, the NJC may use images of race day patrons from promotional purposes.

Media and Report

The media may also be present at NJC premises on some occasions. We note that this Privacy Policy does not regulate the activities of the media.

Links to other websites

NJC's websites may contain links to other websites and this Privacy Policy has no application to those websites. Linked websites are not under the control of NJC, and NJC is not responsible and has no liability in respect of the privacy practices or contents of other websites. Users should examine the privacy policies of those websites before they disclose any of their personal information to them.

The links contained in NJC's websites should in no way be construed as an endorsement, approval or recommendation by NJC of the owners or operators of the linked websites or of the content, products or services contained on or referred to by the linked websites.

Job Applicants, Employees and Service Providers

Information we collect from job applicants and from any individuals who propose to provide services to NJC varies, but may include:

- your full name;
- residential address;
- telephone number(s);
- email address;
- gender;
- details about your qualifications, skills and employment history;
- copies of qualification certificates or memberships of professional bodies;
- information about your current salary level;
- your citizenship status and/or right to work;
- whether you have a disability or illness that we may need to accommodate;
- information from referees provided in relation to you;
- links to your professional profiles (e.g. LinkedIn or corporate website);
- your emergency contact person's details;
- whether you have any criminal convictions.
- company name (where applicable);
- postal address;
- your ABN or other applicable tax information;
- banking or payment information; and
- health information (including results of medical checks).

If you don't provide some or all of this information, we may not be able to respond effectively to your request, application, proposal, or other communications with us.

We may collect personal information about you from references you supply as a job applicant or as a supplier to NJC. We may obtain your personal information from recruitment agencies who you have dealt with. We may obtain publicly available information about you, such as from LinkedIn or a corporate website.

The NJC will use your personal information to assess your application or proposal and then, if you are successful, in an ongoing relationship with you. We may also use your personal information for other purposes that are reasonably necessary for the purposes of carrying out our business and operations.

In regards to job applicants, employees and service providers, in addition to the ways in which we disclose personal data generally, the NJC may also disclose the information we collect from you as follows:

- *Recruitment or third party agencies and references* – we may disclose your personal information to recruiters who provide your information to us on an ongoing basis, to third party references and to providers of medical reports you've provided to us, and to enable verification and background checks; and
- *Service providers* – we share your personal information with third-party service providers who provide services including email and mail handling, electronic funds transfer, credit card account processing, market research, catering, data storage and processing, software, system development and maintenance, or who otherwise administer activities on our behalf.

Previous suppliers or job applicants may receive communications from us about upcoming positions available or services required by the NJC.

It is important for employees to note that personal information about them contained in NJC records will usually be the subject of an exemption under the Privacy Act that applies to employee records. Employees do not have the right to access or seek correction of these records. If an employee's personal information happens to change during the course of their employment, they are required to update their details by providing their new details to their line manager or directly to a representative from Payroll.

Managing your personal information

You have the right to access and correct your personal information held by the NJC.

Please contact us via our contact information below if you:

- wish to access, correct, or modify your personal information;
- consider that there may have been a breach of your privacy;
- would like to opt-out of receiving marketing or promotional communications from us; or
- are unhappy with any aspect of the way we process your personal information.

We will respond to your enquiry within a reasonable time. If you are not satisfied by our response, you may contact the Office of the Australian Information Commissioner (Tel: 1300 363 992 or email: enquiries@oaic.gov.au).

Contact Details

Please contact us if you would like to access your information or have any further questions or concerns about your privacy, and our conduct online.

Email: reception@njc.com.au

Phone: 49611573

Mail: Admin Operations Manager, Newcastle Jockey Club, PO Box 30, Broadmeadow NSW 2292.

Changes to our policy

We may update this Privacy Policy from time to time by posting an updated version at newcastlepacecourse.com.au. We therefore encourage you to review this page regularly. Your continued use of an NJC website will indicate acceptance of our Privacy Policy on our website at that time.

3. ASSOCIATED POLICIES

Complaints and Grievances Policy

4. REVISION HISTORY

Rev	Date	Revision Description	Approved
1	01/11/17	Initial Policy	CEO
2	01/07/22	Full Review of Policy	CEO
3	27/02/23	Full Review of Policy	CEO