



### 1. Policy Commitment

VRC is committed to establishing and maintaining a framework for the collection, use and disclosure, security, access and correction of the Private Information it collects, uses and discloses, by complying with its obligations under the *Privacy Act*. In addition, VRC is committed to establishing and maintaining a complaint handling process for investigating breaches of the Australian Privacy Principles.

### 2. Policy Objectives

- (a) Comply with the objectives of the Privacy Act;
- (b) Incorporate the Australian Privacy Principles into the way VRC works and interacts with others;
- (c) Identify VRC's activities and functions giving rise to the legitimate collection of Private Information;
- (d) Ensure that VRC's contract partners and service providers who handle transferred or cross-border Private Information are subject to the Australian Privacy Principles (or substantially the same protections);
- (e) Establish a training program to ensure that VRC staff are aware of their obligations;
- (f) Establish a process for VRC to consider the impact on privacy of any new initiative;
- (g) Ensure the integrity of VRC's handling of personal information; and
- (h) Establish a complaints handling service to investigate possible privacy breaches.

### 3. Scope

The Privacy Policy relates to VRC and gives rights to members, customers and anyone else whose Private Information is held by VRC.

### 4. Specific Requirements

#### 4.1 VRC complies with the Australian Privacy Principles

- (a) We have adopted the Australian Privacy Principles (see Appendix 1) and continually work towards ensuring that our practices, procedures and systems comply with those principles.
- (b) We train new employees on the Australian Privacy Principles and our practices, processes and systems that support those principles.
- (c) We review our contractual arrangements with third parties who handle Private Information to ensure that those third parties are subject to the Australian Privacy Principles or, where the Private Information will be held outside Australia, substantially similar protections.
- (d) We consider the impact of any new initiative, process or system on the Australian Privacy Principles and the integrity of Private Information protection;
- (e) We review our compliance with the Australian Privacy Principles, including our obligation to review this policy annually.

## 4.2 VRC collects, uses and discloses, holds and destroys Private Information related to its functions & activities

- (a) We collect, use, hold and disclose Private Information related to the following functions and activities:
- Recruitment;
  - Membership;
  - Ticketing, facilities & dining;
  - Marketing;
  - Racecourse operations;
  - Sponsorship & partnerships;
  - Events;
  - Competitions;
  - Customer service;
  - Gaming operations;
  - Newsletter subscription.
- (b) We are open and transparent about the management of Private Information and we have identified the type of Private Information we collect, how it's collected and how it's used and disclosed (See Appendix 2 – Collection, Use & Disclosure of Personal Information Disclosure Document, which is updated from time to time).
- (c) We (or third parties engaged by us) may place cookies on user's browsers for target marketing. You may opt out by following the instructions specified at: [www.aboutads.info](http://www.aboutads.info) or for those in Europe: [www.youronlinechoices.eu](http://www.youronlinechoices.eu)
- (d) We take reasonable steps to protect Private Information that we hold from misuse, interference, loss, unauthorised access, modification or disclosure and may hold Private Information in the following ways:
- Email (secured server);
  - Hard drive (secured server);
  - Physical files (physically secured); and
  - Customer Relationship Management database (secured server).
- (e) We delete Private Information in accordance with our Privacy Procedure. We will periodically review Private Information that we hold. Where we no longer require such information for any purpose for which the information was collected, we will take steps to destroy or de-identify the information.

## 4.3 How do I access and correct my Private Information?

- (a) We will ensure when Private Information is collected (on a form or electronically) that it contains a notice informing the person why the information is collected and how to access and correct it.
- (b) Requests for access or correction should be forwarded to our Privacy Officer using any of the following methods:
- By phone: 03 8378 0888
- By email: [privacy@vrc.net.au](mailto:privacy@vrc.net.au)
- By post: **Private & Confidential**  
The Privacy Officer  
Victoria Racing Club Limited  
448 Epsom Road,  
Flemington Victoria 3031
- (c) We will ensure that all requests for access or correction are considered and determined, free of charge, within 30 days of receipt.

#### 4.4 How can I complain about a breach of the Australian Privacy Principles affecting my Private Information?

- (a) You may contact the Privacy Officer to discuss any concerns over our handling of your Private Information by calling 03 8378 0888.
- (b) Alternatively, you may lodge a complaint with the Privacy Officer, in writing, by completing a Privacy Complaint Form (Appendix 3) and emailing it to [Privacy@vrc.net.au](mailto:Privacy@vrc.net.au), or posting it to:

Private & Confidential  
The Privacy Officer  
Victoria Racing Club Limited  
448 Epsom Road,  
Flemington Victoria 3031

##### 4.4.1 How will my complaint be handled?

Our Privacy Officer will consider all complaints objectively in line with our Privacy Complaint Procedure and will:

- Acknowledge receipt of the complaint in writing;
- Conduct an initial assessment of the complaint;
- Investigate or engage an appropriate investigator to investigate the complaint;
- Make a determination as to whether VRC has breached an Australian Privacy Principle;
- Consider a remedy or action to be taken; and
- Communicate the decision to the person making the complaint within 30 days of receiving the complaint (where possible).

## 5. Definitions

**Australian Privacy Principles** or **APP** means those principles set out in Schedule 1 of the *Privacy Act*, which are reproduced in Appendix 1.

**Personal Information** means information or an opinion about an identified individual, or an individual who is reasonably identifiable: (a) whether the information or opinion is true or not; and (b) whether the information or opinion is recorded in a material form or not.

**Privacy Act** means the *Privacy Act 1988 (Cth)*.

**Privacy Officer** means the person performing the role of Privacy Officer from time to time.

**Private Information** means Personal Information and Sensitive Information.

**Sensitive Information** means:

- (a) information or an opinion about an individual's:
  - (i) racial or ethnic origin; or
  - (ii) political opinions; or
  - (iii) memberships of a political association; or
  - (iv) religious beliefs or affiliations; or
  - (v) philosophical beliefs; or
  - (vi) memberships of a professional or trade association;
  - (vii) memberships of a trade union; or
  - (viii) sexual orientation or practices; or
  - (ix) criminal record (that is also personal information); or
- (b) health information about an individual; or
- (c) genetic information about an individual that is not otherwise health information; or
- (d) biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or
- (e) biometric templates.

**VRC** means Victoria Racing Club Limited.

## **6. References**

*Privacy Act 1988*

*Privacy Amendment (Enhancing Privacy Protection) Act 2012*

## **7. Appendices**

Appendix 1 – Australian Privacy Principles

Appendix 2 - Collection, Use & Disclosure of Personal Information Disclosure Document

Appendix 3 – Privacy Complaint Form

## **Australian Privacy Principles**

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The Australian Privacy Principles are:

**Australian Privacy Principle 1**—open and transparent management of personal information

**Australian Privacy Principle 2**—anonymity and pseudonymity

**Australian Privacy Principle 3**—collection of solicited personal information

**Australian Privacy Principle 4**—dealing with unsolicited personal information

**Australian Privacy Principle 5**—notification of the collection of personal information

**Australian Privacy Principle 6**—use or disclosure of personal information

**Australian Privacy Principle 7**—direct marketing

**Australian Privacy Principle 8**—cross-border disclosure of personal information

**Australian Privacy Principle 9**—adoption, use or disclosure of government related identifiers

**Australian Privacy Principle 10**—quality of personal information

**Australian Privacy Principle 11**—security of personal information

**Australian Privacy Principle 12**—access to personal information

**Australian Privacy Principle 13**—correction of personal information

**Collection, Use & Disclosure of Personal Information Disclosure Document**

Type of personal information collected	How the personal information is collected	Why the personal information is collected	How the personal information is used	How the personal information is disclosed (with consent where required)	Whether the personal information will be disclosed overseas
<b>Recruitment</b>					
<b>Name, contact details, work history, references</b>	Recruitment records – Resume, Application Letter	To determine the suitability for the role	To inform the interview panel & the interview process	May be disclosed to referees to enable references to be checked and verified. May be disclosed to internal stakeholders with a role in employment activities	Not unless otherwise stated
<b>VRC membership</b>					
<b>Name, date of birth, contact details, occupation, membership of other clubs, disciplinary action, convictions, bankruptcy status, proposer's &amp; seconder's contact details</b>	Membership Application Forms	To determine suitability for membership	Ticketing Entitlements, Invitations to events, Rewards Program, Voting Rights, AGM Notifications	May be disclosed to third parties who provide goods or services associated with membership, including printing, advertising and mail-house organisations. May be disclosed to third-party market research and data analysis companies	Not unless otherwise stated
<b>Name, address</b>	Phar Lap Club Subscription	To facilitate membership	May be used for ticketing entitlements, invitations to events. May be used for direct marketing	May be disclosed to third-parties who provide goods or services associated with membership, including printing, advertising & mail-house organisations	Not unless otherwise stated
<b>VRC race day ticketing, facilities &amp; dining</b>					
<b>Members contact details, guest name &amp; contact details, dob, &amp; passport number. Payment Credit card</b>	Application forms for race day tickets, dining, booking facilities & car parks	To facilitate ticketing	May be used for booking facilities, catering & payment, to allocate ticket access to areas, to send notices	May be disclosed to third parties who provide goods or services associated with membership, including printing, advertising & mail-house organisations.	Not unless otherwise stated

Type of personal information collected	How the personal information is collected	Why the personal information is collected	How the personal information is used	How the personal information is disclosed (with consent where required)	Whether the personal information will be disclosed overseas
<b>number &amp; holder details.</b>			& booking confirmation. May be used for direct marketing	Payment details securely disclosed to the bank using data encryption. May be disclosed to third-party market research and data analysis companies	
<b>Name, contact details, credit card details &amp; number</b>	Registration – Entertainment & Dining	To facilitate ticketing, booking facilities & catering. To facilitate payment	May be used for direct marketing	May be disclosed to this parties who provide goods or services associated with membership, including printing, advertising & mail-house organisations. Payment details securely disclosed to the bank using data encryption. May be disclosed to third-party market research and data analysis companies	Not unless otherwise stated
<b>General Admission Customer and other guests' name &amp; contact details</b>	Details obtained from a third party ticketing company with rights to sell race day tickets	To facilitate ticketing, booking facilities & catering	May be used for direct marketing	May be disclosed to third parties who provide goods or services associated with membership, including printing, advertising & mail-house organisations	Not unless otherwise stated
<b>Marketing activity</b>					
<b>Images/ Photographs</b>	Official photographers operating in public arena during race days	To promote VRC, membership & ticket sales	May be used on promotional material	May be disclosed to third parties who provide goods or services associated with membership promotion and ticket sales, including printing, advertising & mail house organisations, and displayed on the internet	Internet
<b>Device ID number (MAC address, which is the unique identifier linked to a network interface device - eg mobile phone, tablet etc), name, email, residential postcode</b>	Device ID number is collected if the device is turned on and located on-course. Name, email & residential postcode is collected when the user consents on the VRC application portal.	The information is being collected so that we can identify performance analytics and make improvements to our offerings based on customer movement.	The MAC address may be linked to our customer database and may be used for direct marketing, service messaging and market research and customer analytics.	May be disclosed to market research companies, where consent is obtained but otherwise any disclosure will be de-identified before release.	Not unless otherwise specified
<b>Device ID number, IP address, cookies</b>	This information is collected when a user	Targeted advertising	The information is used by us or 3 <sup>rd</sup> parties	No personal information is disclosed.	No personal data will be transferred.

Type of personal information collected	How the personal information is collected	Why the personal information is collected	How the personal information is used	How the personal information is disclosed (with consent where required)	Whether the personal information will be disclosed overseas
<b>identifier, website activity</b>	visits our websites.		engaged by us to facilitate target advertising or tracking.		
<b>Tours</b>					
<b>Contact person &amp; contact details</b>	Melbourne Cup Tour Tender Application Form	To facilitate travel plans	May be used to obtain survey response for quality and service improvement	May be disclosed to travel agency and other third parties involved in arranging travel and accommodation arrangements.	Not unless otherwise stated
<b>Member name &amp; contact details, passport number. Guest name &amp; contact details &amp; passport number</b>	Members' Tours Application Form	To facilitate travel plans	May be used to send tickets & notices to participants. May be used for direct marketing	May be disclosed to the third-party tour operator	Not unless otherwise stated
<b>VRC –racecourse operations</b>					
<b>Name &amp; contact details, medical alerts, emergency contact &amp; contact details</b>	Induction Acknowledgement of Personal Details Form	To evidence completion of induction. To ensure the health & safety of contractors	May be used to monitor incidents & emergencies	May be disclosed to third parties involved in medical or emergency relief including medical or emergency personnel. May be disclosed internally for health & safety purposes	Not unless otherwise stated
<b>Images</b>	CCTV footage in facilities & grounds	To monitor for safety purposes. To protect our assets	May be used to investigate incidents	May be disclosed to legal representatives and law enforcement agencies	Not unless otherwise stated
<b>Work Health &amp; Safety</b>					
<b>Name, contact details, witness details, incident details, including injury</b>	Incident Report	To investigate the incident and determine root cause. To manage and control risks	May be used to manage WHS & Risk	May be disclosed to medical personnel & legal representatives	Not unless otherwise stated



Type of personal information collected	How the personal information is collected	Why the personal information is collected	How the personal information is used	How the personal information is disclosed (with consent where required)	Whether the personal information will be disclosed overseas
<b>Sponsorship &amp; partners activities</b>					
<b>Name &amp; contact details</b>	Membership Application Forms, Event Data Cards	To collect data for our sponsors for direct marketing purposes		May be disclosed to our sponsors or partners	May be held overseas by our sponsors who are located abroad and may include Dubai
<b>VRC – Events</b>					
<b>Name &amp; contact details</b>	Event Data Cards	To collect data for direct marketing purposes	May be used for direct marketing	May be disclosed to our local web host	Not unless otherwise stated
	Customer Satisfaction Surveys	To collect data for quality assurance, product development & direct marketing purposes	May be used for direct marketing	May be disclosed to our local web host. May be disclosed to third-party market research and data analysis companies	Not unless otherwise stated
<b>VRC – competitions</b>					
<b>Name &amp; contact details</b>	VRC Competition Entry Forms & Door Prize Forms Sponsors Competition Entry Forms	To facilitate the draw	May be used for direct marketing	May be disclosed to our local web host. May be disclosed to sponsors or partners	Not unless otherwise stated
<b>Name, contact details, dob, gender</b>	Fashions on the field entry forms	Competition registration	May be used for direct marketing	May be disclosed on our website & promotional material. May be disclosed to our sponsors or partners for direct marketing	Not unless otherwise stated
<b>Customer Service</b>					
<b>Name, contact details &amp; nature of enquiry</b>	Online Contact Us Form Data Capture Form	To give customers an electronic alternative for lodging an enquiry	May be forwarded to the person who can best respond to the enquiry	May be disclosed to staff or contractors	Not unless otherwise stated
<b>Gaming Operations</b>					
<b>Name, date of birth,</b>	Diamond rewards	For membership	May be used to notify	May be disclosed to the TGS	Not unless otherwise

Type of personal information collected	How the personal information is collected	Why the personal information is collected	How the personal information is used	How the personal information is disclosed (with consent where required)	Whether the personal information will be disclosed overseas
<b>contact details, occupation</b>	membership application	registration	members of offers and for direct marketing	(Diamond Rewards Program Host) to conduct industry promotions	stated
<b>Name, date of birth, contact details</b>	Gaming wins exceeding \$1000 log book	To comply with Anti-money laundering & counter terrorism laws	May be used to monitor suspicious transactions	May be disclosed to AUSTRAC where requested	No
<b>Image and name of self-excluded person</b>	Forwarded to VRC by Australian Hotels Association (AHA)– Self Exclusion Program	To facilitate the self-exclusion process	Will be used to monitor and prevent gaming by self-excluded participants	Will be displayed to staff. If breach arises, details of incident will be disclosed to AHA	No
<b>Images</b>	CCTV footage at HeadQuarters Tavern	To monitor for safety purposes. To protect our assets	May be used to investigate incidents	May be disclosed to legal representatives and law enforcement agencies	Not unless otherwise stated
<b>Newsletter</b>					
<b>Name, contact details</b>	Online Flemington News Subscription Data Capture Form	To promote VRC news & events	To notify subscribers of news and events	May be disclosed to our local web host	Not unless otherwise stated

# Privacy Complaint Form

Please read this before lodging a Privacy Complaint...

1. **This form will assist you to make a complaint about the handling of your personal information under the *Privacy Act 1988 (Cth)*.**
2. **We can only consider complaints made about a person's private information from the person themselves (or an authorised representative of that person).**
3. **Any information collected on this form may be used or disclosed for the purposes of the investigation process but only if it is relevant to the complaint.**
4. **Allegations made about a third person's actions may be put to them.**
5. **Write clearly so that we can get a full understanding of the issue and we are able to contact you.**
6. **If you need to ask any questions about privacy or the complaints process, contact VRC's Privacy Officer on 03 8378 0888**

## About you.....

**Name** Mr/Mrs/Ms/Miss.....

**Address** .....  
.....

**Telephone:** (....) ..... **Mobile** .....

**Email Address:** .....

## I want to appoint a representative to act on my behalf.....

**Name of Representative** Mr/Mrs/Ms/Miss.....

**Relationship of Representative to complainant** .....

**About the issue.....**

**What happened?** .....

**Remember to include (where applicable):** .....

- **When & where it happened (including dates and how you discovered alleged use)** .....
- **Details of anyone involved** .....
- **What action you would like VRC to take** .....

**Supporting documentation?**

**Are there any documents that you can give us that may help us investigate?** Attachment 1.....  
Attachment 2.....

**Lodge your complaint....**

**Where do I lodge my complaint?** Private & Confidential  
The Privacy Officer  
Victoria Racing Club Limited  
448 Epsom Road  
Flemington Victoria 3031

**Signatures.....**

**My Signature:** ..... **Date:** ..... / ..... / 20.....

**My Representative's Signature (if applicable)** ..... **Date:** ..... / ..... / 20.....