

# The Lottery Corporation Privacy Policy



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# 1. Privacy at The Lottery Corporation

At The Lottery Corporation, we're committed to privacy, transparency and information security. We know that your privacy is important to you, and we value, trust and respect your personal information. This policy is in place to explain how we collect, hold, use and disclose it.

We handle personal information in accordance with the *Privacy Act 1998* (Cth) (**Privacy Act**), the Australian Privacy Principles (**APPs**), and this Privacy Policy.

We've got a range of security measures in place to help manage and safeguard your information. Every team member of The Lottery Corporation is trained to understand what our privacy obligations are and how to ensure they're implemented. We take your privacy very seriously. All suspected instances of non-compliance amongst our team members will be investigated and may result in appropriate disciplinary or remedial action.

We also make it clear to our suppliers that we expect them to comply with the Privacy Act and the APPs when handling your personal information. Non-compliance will be regarded as a serious matter and may result in termination of the relevant contractual arrangement.

We regularly review this policy and our practices to ensure we're upholding our commitment to your privacy.

## Why does this matter?

Each Australian entity in The Lottery Corporation is bound by the Privacy Act and the APPs. It's on us to keep you up to date on these matters.

Reading through the policy is the best way to understand what we do with your personal information.

## About our Privacy Policy

### Which companies are covered by this policy?

This Privacy Policy applies to the Lottery Corporation Limited (ACN 081 925 706) and its related bodies corporate, including the customer facing brands Keno and The Lott, (**The Lottery Corporation**). The Lottery Corporation is no longer part of the Tabcorp group of companies.

### Important Definitions

In this Privacy Policy:

- we also refer to The Lottery Corporation **as we, us, or our**;
- we refer to our employees and contractors as **team members**;
- we refer to our lotteries retail franchisees and agents, as well as Keno agents and licensed venues, as our **retail network**;
- an **account** is an account or membership program that we offer to you through any website, mobile device application (App), or in our retail network that allows you to use our products and/or services;
- **personal information** means information or an opinion about you which identifies you, or any information that can be used to identify who you are; and
- this Privacy Policy is also referred to as this **policy**.

# 2. What Types of Information do we Collect and Hold?

## Personal Information

We need to collect some of your personal information to offer you our products and services and generally manage our business. Sometimes, the law, conditions of our licences, and gambling rules require us to collect it. The kind of personal information we collect depends on how and why you are engaging with us, but it can include:

- 
**contact information** – name, address, email address, and telephone number
- 
**identification verification information** – date of birth, driver licence, passport, birth certificate, Centrelink details, electoral roll details, visa information, utility bills and/or your photo combined with any of these documents
- 
**banking or payment details** - credit card, bank account, PayPal account details or other payment details
- 
**your purchasing behaviour and transaction history with us**
- 
**your online interactions and personal preferences** including interactions with our websites, Apps, social media channels, communications, surveys, advertising and third-party websites and apps that display our advertising
- 
**your health information** when you engage with our responsible gambling programs
- 
**video and voice data** – voice recordings and data when you interact with us by telephone or through voice assistant technology and video surveillance at certain The Lottery Corporation premises and in our retail network
- 
**location, device and system data** – information about your device like your IP address, device ID and operating system version, and your physical location via your mobile device information where you have opened an account with us, or accessed or used your existing account, using your mobile device – the specific location data collected depends on the platform you are using and your mobile device or account settings

**Do we Collect Sensitive Information?**

The Privacy Act imposes additional obligations and protections on sensitive personal information like your race, ethnicity, political opinions, religious or philosophical beliefs, sexual orientation, criminal record or health information.

We do need to collect, use and disclose sensitive information sometimes - this is set out in section 11 and section 14 of this policy. If we need this, we'll ask your permission, except where otherwise allowed by law.

# 3. How do we Collect your Personal Information?

In most cases, we'll simply collect your personal information from you directly. We do this when you interact with us.

 <p>via our websites, mobile Apps, social media channels, (including through cookies, see section10)</p>	 <p>over the telephone</p>	 <p>when using our product terminals</p>	 <p>by mail, email or in person</p>
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In some cases, we may collect your personal information from third parties and other sources. For example:

- identity service providers, who assist us in verifying the identity of our customers, see section 5 for more detail;
- our share registry provider;
- our retail network;
- a supplier of training, research, marketing consultancy or other services to us;
- the types of third parties listed in section7, including where you work for one of these third parties who provide services to us;
- public sources (e.g. social media and search websites);
- our industry regulators; and/or
- any other relevant Commonwealth, state or territory government authority or agencies.

We may also collect your personal information in line with any proposed or actual sale of any The Lottery

Corporation business or purchase of an interest in another business, including any related transition, separation and collaborative arrangements (**Corporate Transactions**).

We may also generate new personal information through reports and analysis based on other personal information we hold.

If we're unable to collect your personal information, we won't be able to provide our products and services to you. It also means that any account that you may hold with us will operate with restrictions. Here's an example: if you don't give us the necessary information we need to verify your identity we won't be able to:

- issue or administer any The Lottery Corporation shares you have applied for (e.g. pay you dividends or send you important shareholder communications); and/or
- provide certain products and services to you.

You must have consent to provide personal information about someone else to us based on this policy .

# 4. How do we use your Personal Information?

We collect, store, use (and at times disclose) the personal information we have about you **to provide you with our products and services** and to **manage our business**, which includes the following reasons:

1

to meet **our legal requirements** - like verifying your age and identity

2

to perform **administrative and operational tasks** – like account management, systems development and testing, risk management, investigation of unlawful activity, staff training, maintaining our records, market and customer satisfaction research or collecting debts

3

**to manage, administer and improve the quality of our products and services** and our retail network

4

to **personalise your online experience and to tailor our marketing communications when we market our products and services** to you (for more information on marketing, please see section9)

5

to monitor our **franchisee and agent's compliance** with their obligations to us and to our customers

6

to **undertake analytics activities** that inform our product development initiatives and marketing campaigns

7

to administer our **responsible gambling programs** (for more information on responsible gambling, please see section11)

8

to **protect the safety and security** of our people, offices, stores and assets

9

to protect and defend our **legal rights** and interests

10

to **facilitate Corporate Transactions**

11

for other reasons where **the law, the conditions of our licences and relevant rules** may require or allow us to use your personal information

# 5. Your Identification Information

We need to verify your age and identity before we can provide you with our online products or services. We use an identity services provider, GreenID, to help us with this. GreenID is approved to access the Government's Document Verification Service as well as other third-party sources on our behalf. They use the personal information (which may include government identifiers) that you provide and compare that information against a range of verified sources to confirm your identity.

When you verify your identity with us, we will:

- disclose your personal information (which may include government identifiers) to GreenID; and
- ask GreenID to assess whether the information we give them matches the information in the source databases that they have access to.

If we can't verify your age and identity using this service, we'll notify you.

If you do not want us to disclose this information to GreenID, you'll need to contact the customer service team relevant to the products and services you want to use or access and we can talk through your options.

In some instances, we may also collect your identification verification information directly from you. For example, when you request to change your account details after a legal name change. In these circumstances, once we have processed your request - we delete any copies of your identity documents.

The Lott	Lotteries customer support team on 131 868
Keno	Keno customer support team on 1800 056 066

## 6. Do we Combine your Personal Information?

If you have more than one account with us, we will sometimes combine your personal information into one account.

This will only happen within a brand you are dealing with, and not across our brands. For example, if you have an online lotteries account and an in-store membership, we will match those accounts so that it is easier for you to interact and receive services from us.

# 7. Who do we Share your Personal Information with?

We share your personal information in line with this policy. Before we do, we ensure we have arrangements in place with those receiving your personal information – ensuring they keep it secure and confidential.

Depending on how you engage with us, we'll disclose your personal information as follows:

- among **The Lottery Corporation**;
- where **you have consented** to it, for example, to a secondary contact you nominate;
- to our **third party service providers** that we engage directly to provide you with our products and services and manage our business, including:
  - third parties as part of our responsible gambling programs;
  - third parties that provide us with technology solutions to manage our business and support our platforms;
  - third parties that provide identity verification and fraud detection services;
  - our print partners when we send you direct mail; and
  - third parties that provide us with marketing consulting and personalisation services, research and / or targeted advertising services,
- parties involved in **Corporate Transactions**, including advisers and parties providing transitional services which may include data maintenance and migration;
- to our **industry regulators** so we can respond to enquiries, to comply with laws and comply with the conditions of our licences;
- to our **professional advisers**, consultants, contractors and subcontractors;
- to banks, financial institutions and **payment processing providers** so that we can process any payments to you;
- to our **retail network** so that it can provide you with our products and services; and
- to our **charity partner**, The 50-50 Foundation Ltd, if you have provided your consent, so that it can send you information about its products and services (see section 9 for more information).

## If I win a prize, will my name be made public?

If you are lucky enough to win a prize playing in one of our lotteries or playing keno, we will not share your name, winnings or any other personal information publicly without your express consent. Our Public Relations team will discuss these options with you if you receive the lucky call!

# 8. Disclosure of your Personal Information Overseas

Sometimes the third parties we disclose your information to are overseas, including in:

- the United States of America
- Germany
- Ireland
- India
- Denmark
- United Kingdom
- Canada
- Philippines
- Singapore



If we send your information overseas, we take every reasonable step to make sure these overseas recipients handle your information in accordance with the APPs, or ensure that the transfer of your information is in accordance with the applicable law/s.

# 9. Marketing and Research

## Direct Marketing

We use your personal information to send you information and advertisements about our products and services we think you'd be interested in. Generally, we'll only use your personal information to tell you about the products and services that you've expressed an interest in using. For example, if you hold a Keno account with us, we will use your personal information to tell you about products and services that are relevant to Keno. Sometimes, we'll also use your personal information to tell you about our other products and services, or the products and services of:

- our charity partner, The 50-50 Foundation Ltd;
- our retail network;
- our club and hotel industry partners.

We may tell you about these things by various methods including mail, email, SMS text message, push notifications (if they're enabled on your device), MMS and phone calls. There's more detail on how we do this, and how you can opt-out, below.

## Targeted Online Advertising

As mentioned above, we use your personal information to market our products and services to you - and to show you advertisements. We use digital platforms like Facebook, Google, LinkedIn, and Instagram. We use marketing agencies and software services to help us deliver that advertising, and to allow them to tell you about our products and services that may be of interest to you based on your interactions with us.

These companies may use personal information that they already hold, or information we may provide to them, to serve you with more relevant advertising about our products and services. They don't use your personal information from us for their own purposes.

Our marketing agencies may contact you directly on our behalf if directed by us in order for us to gain a greater insight into how we can develop products and services that are more relevant to you, for instance, in order to conduct market research. You can hide most targeted advertising by following the prompts in that advertising. If you hide it, you won't get any online advertising based on the personal information we hold and disclose. You may still see similar advertisements

based on your anonymous browsing history and untargeted advertisements.

## Analytics

We generate aggregated and personalised insights about our businesses and brands from the personal information that we hold. These insights help us to identify trends and patterns that mean we're creating the right products and services for our customers. This information also drives our marketing campaigns and helps us assess how effective they are.

## Opting-Out of Direct Marketing

You can opt-out of receiving direct marketing communications any time. How you opt-out will depend on the channel you received or saw the communication in. You'll find the specific instructions through each marketing piece. If you can't find this opt-out information, please contact the relevant customer service centre below and they can manually record your marketing preference.

**The Lott** – [customersupport@thelott.com](mailto:customersupport@thelott.com)

**Keno** – [help@keno.com.au](mailto:help@keno.com.au)

# 10. Personalisation and Cookies



When you use our websites and / or mobile Apps, we may personalise your experience . We do this using your customer or account numbers and by using cookies. Cookies allow a website or application to identify and interact with your computer. They're small files that store information on your computer, mobile phone or other device. Cookies and other information like your device ID mean we can recognise you across different websites, services, devices and browsing sessions. We use this to do things like assign you to the right jurisdiction for your location, altering website navigation based on your most visited pages, or displaying results, etc. from your previous browsing or purchasing.

From time to time we may also use cookies from third party websites (for example, those that display our advertising) to personalise your online experience with us. In some cases, you can disable cookies through your internet browser settings. You can also delete cookies from within your browser's cache. If you disable or delete your cookies, you can still use our websites, but they might not be personalised or offer you complete functionality.

The Lottery Corporation has a Cookies Policy that sets out exactly what cookies we use and how you can disable or delete them. You can access It [here](#).

# 11. Responsible Gambling



At The Lottery Corporation, we're committed to delivering our products and services responsibly by supporting a well-regulated and responsible gambling industry, characterised by integrity at all levels.

## Self-exclusion

Sometimes, we'll collect your sensitive information (which may include your health information) when you choose to self-exclude from play. We do this to administer our responsible gambling programs and comply with our responsible gambling obligations across Australia.

## Early Intervention

At The Lottery Corporation, we also actively monitor account and playing behaviours to identify customers who might be at risk of gambling harm. The purpose of this monitoring is to intervene early when we see certain playing behaviours, so that our customers can make informed choices about their future playing habits.

We monitor the following types of playing behaviours:

- changes in spend, deposit and withdrawal amounts;
- changes in playing patterns such as time and frequency played;
- changes in games played; and
- changes in net loss amounts.

We may also monitor the emails you send us and information you provide us during telephone calls and your online activity for similar types of playing behaviours or other signs of gambling harm – this is to support you and help you make informed choices in line with our responsible gambling programs.

As part of our early Intervention monitoring, we use personal information to contact you by phone or email in circumstances where we think you may need additional support.

You can read more about our responsible gambling programs by visiting <https://www.thelott.com/about/responsible-play> if you are a customer of The Lott and <https://www.keno.com.au/responsible-gambling/home> if you are a Keno customer.

# 12. How do we Keep your Personal Information Secure?

Put simply, we have security measures built into our systems and processes to protect you.

We store any hard copy and electronic records of your personal information in secure buildings and systems and only use trusted third-party cloud storage providers. You can be sure that we have various measures in place to protect and safeguard the personal information that we hold.



## What do you do to Keep it Safe?

We:

- train our team members in how to keep your information safe and secure;
- maintain computer and network security by using firewalls, identification codes and passwords;
- implement physical security like locks and other security systems at our offices and in our retail network; and
- maintain and monitor our online security systems, which includes restricting unauthorised access and backing up our systems.

# 13. How can I Access, Update or Correct my Personal Information?

We always want to be up to date with your information, so we'll take reasonable steps to make sure everything's accurate and complete.

## How can I Access my Personal Information?

You can ask us for a copy of the personal information we hold about you, by writing to us.

Email: [privacy@thelotterycorporation.com](mailto:privacy@thelotterycorporation.com)

Mail: Privacy Officer  
Level 8, 180 Ann Street  
Brisbane QLD 4000

We will need to verify your identity before we can do this.

**Is there a fee?** There's no fee to ask for your information, but we may charge you an access fee to cover the time we spend finding and putting together the information you have a right to ask for. We will tell you any charges before you need to pay them.

**How long will it take?** This can usually be available within 30 days of your request.

**Can we decline access?** We can in some cases. We can also give you access to some information and not the rest. For example, we may not share information that's commercially sensitive or could impact other individuals. Or, if we're investigating possible illegal activity and it may hinder any investigations. But we'll always let you know why, and if you disagree there's a complaints process below.

## How can I Update or Correct my Personal Information?

It's important that we have your correct information, especially your contact information. You can check and update some of the information we hold about you by logging in to your account on our websites or Apps, or by calling us. You can ask us to update or correct the personal information we hold about you, by contacting our customer support team of The Lottery Corporation brand you are dealing with or by writing to us.

Email: [privacy@thelotterycorporation.com](mailto:privacy@thelotterycorporation.com)

Mail: Privacy Officer  
Level 8, 180 Ann Street  
Brisbane QLD 4000

We won't charge a fee for this.

We can't always remove or modify information in our databases, but we'll always do our best to correct your personal information. If we have to decline your request, we'll let you know why and you can ask us to attach your incorrect personal information to a statement detailing that it is inaccurate.

If the incorrect information was disclosed to someone else pursuant to this policy, you can ask us to notify the third-party of the correction we've made and we'll try our best to do that.

# 14. Thinking of Working for us or Working in our Retail Network?

If we collect personal information about you as you're working for us or in our retail network, we'll collect, use and disclose it in accordance with this policy. This section of our policy explains some of the additional types of information we collect and different ways we use and disclose this either:

- when you work with us (directly or indirectly, e.g. as an employee of a labour supply company);
- as part of the process of applying for a job with us; or
- as part of the process of becoming a franchisee or agent within our retail network.

## What Information do we Collect and Hold?

We also collect and hold the following personal information about you including:

- **contact information** – name, address, email address, and telephone number;
- **application and CV information** – academic results and qualifications, expertise and experience, employment history, personal interests, salary expectations, background checks;
- **information regarding your right to work** – citizenship, migration and/or visa status;
- **sensitive information** – criminal record, whether you are a politically exposed or sanctioned person, whether you are of Aboriginal or Torres Strait Islander descent, any disability you may have, other health information if you work for us;
- information regarding **any civil proceedings or pending litigation** that you are or have been a party to;
- your **tax file number**;
- your **business records** – including bankruptcy checks and accounting information when you apply to become a franchisee or agent with us;
- **banking or payment details**; and
- other **employment information** – information about training, emergency contacts, performance, conduct, use of our IT and communications resources, payroll matters, drug/alcohol tests, leave and tax/financial affairs.

Most of the time we collect this information from you directly. However, we may also:

- collect your personal information from a third-party supplying recruitment services to us, or a referee nominated by you;
- search government records and publicly available sources, including social media and other internet sources; and/or
- through third parties such as credit reference institutions, landlords, brokers or retailers business, financial or legal advisors.



## Why do we Collect, Store, Use and Disclose this Information?

- To see if you're **suitable for a role with us**.
- To see whether you're legally **entitled to work** in Australia.
- As part of our **assurance program** on the identity, honesty and integrity of prospective and current team members, as well as current and prospective franchisees and agents.
- In respect of your tax file number, to assess our obligations to withhold any applicable taxes as well as to ensure our own **compliance with regulations**.
- In respect of information regarding whether you are of Aboriginal or Torres Strait Islander descent, and/or any disability you may have, for the purpose of **reporting de-identified data to relevant government and regulatory authorities**.
- To meet our **legal requirements**.
- To perform **administrative and operational tasks** – including human resources management, systems development and testing, risk management, investigation of unlawful activity, staff training, maintaining our records and workplace research.
- To **protect the safety and security** of our people, sites and assets.
- To protect and defend our **legal rights** and interests.
- To **facilitate Corporate Transactions**.
- For other reasons where the **law, the conditions of our licences and relevant rules** may require or allow us to use your personal information.

Background checks may require us to disclose information about you to our regulators and to other third-parties.



## Working in our Retail Network

If you're working in our retail network, we may collect and hold personal information about you including:

- **contact information** – name, address, email address, and telephone number;
- **employment details** – copies of pay slips, rosters, proof of payment of wages, proof of payment of superannuation;
- **information regarding your right to work** – citizenship, migration and/or visa status; and
- your **tax file number**.

We'll generally collect this information from you directly. But we may also need your employer to release its records containing your information. Where we collect this information, it is to monitor your employer's compliance with relevant workplace laws including those under the *Fair Work Act 2009* (Cth) and/or if we suspect there is, or may be, an area of non-compliance by your employer.

# 15. How can you Make a Privacy Complaint?

If you're worried about how we have handled your personal information or your privacy, let us know so we can take steps to address your concern. If we don't address your concern when you first raise it, you can make a complaint and we'll do our best to resolve it for you. To make a privacy complaint, please contact our Privacy Officer in writing.

Email: [privacy@thelotterycorporation.com](mailto:privacy@thelotterycorporation.com)

Mail: Privacy Officer  
Level 8, 180 Ann Street  
Brisbane QLD 4000

It's helpful to us if your written complaint includes a brief description of what happened and when, and what outcome you'd like.

## How do we Manage Complaints?

We treat all privacy complaints seriously. After you have lodged your complaint in writing, we'll:

- investigate the circumstances of your complaint;
- assess your complaint (aiming to resolve it quickly and efficiently) ;and
- respond to you in a reasonable time, usually 30 days.

It's easiest if you cooperate with us during the complaints process and provide us with information we may need to investigate and assess your complaint.

## What else can you do?

If you're not satisfied with how we manage your complaint or if our decision doesn't resolve your complaint, you may contact the Office of the Australian Information Commissioner.

	Email:	<a href="mailto:enquiries@oaic.gov.au">enquiries@oaic.gov.au</a>		Phone:	1300 363 992
	Mail:	GPO Box 5218, Sydney NSW 2001		Visit:	<a href="http://oaic.gov.au">oaic.gov.au</a>

# 16. How to Contact Us

If you have any questions or have feedback about how we treat your privacy or handle your personal information, we're here to chat. Please contact:

**The Privacy Officer**

Email: [privacy@thelotterycorporation.com](mailto:privacy@thelotterycorporation.com)

Mail: Privacy Officer  
Level 8, 180 Ann Street  
Brisbane QLD 4000

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