



## 1. Policy Commitment

VRC is committed to establishing and maintaining a framework for the collection, use, storage, disclosure, security, access and correction of the Personal Information it collects, uses, stores and discloses, by complying with its obligations under the Applicable Privacy Laws, namely, the Australian Privacy Act, EU GDPR and UK GDPR. In addition, VRC is committed to establishing and maintaining a complaint handling process for investigating breaches of the Applicable Privacy Laws. All capitalised terms referred to in this Privacy Policy have the meaning set out in section 5.

## 2. Policy Objectives

- (a) Comply with the objectives of the Applicable Privacy Laws;
- (b) Incorporate the Applicable Privacy Laws into the way VRC works and interacts with others;
- (c) Identify VRC's activities and functions giving rise to the legitimate collection of Personal Information;
- (d) Ensure that VRC's contract partners and service providers who handle transferred or cross-border Personal Information are subject to the Applicable Privacy Laws (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 Personal Information is collected by VRC.

## 4. Specific Requirements

### 4.1 VRC complies with the Applicable Privacy Laws

- (a) We have adopted the Applicable Privacy Laws, including the Australian Privacy Principles and continually work towards ensuring that our practices, procedures and systems comply with those principles.
- (b) We train new employees on the Applicable Privacy Laws and our practices, processes and systems that support those principles.
- (c) We review our contractual arrangements with third parties who handle Personal Information to ensure that those third parties are subject to the Applicable Privacy Laws or, where the Personal Information will be held outside Australia, the UK or the EU (as the case may be) substantially similar protections.
- (d) We consider the impact of any new initiative, process or system on the Applicable Privacy Laws and the integrity of Personal Information protection;

- (e) We review our compliance with the Applicable Privacy Laws, including our obligation to review this policy annually.
- 4.2 VRC collects, uses, discloses, holds and destroys Personal Information related to its functions & activities.
- (a) We collect, use, hold and disclose Personal Information related to the following functions and activities for our legitimate interests including:
- Recruitment;
  - Membership;
  - Ticketing, facilities & dining;
  - Marketing;
  - Racecourse operations;
  - Administration;
  - Management of contractors and employees;
  - Sponsorship & partnerships;
  - Events;
  - Competitions;
  - Customer service;
  - Gaming operations;
  - Newsletter subscription.
- (b) We are open and transparent about the management of Personal Information and we have identified the type of Personal Information we collect, how it is collected and how it is used and disclosed (See Appendix 1 – 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. A cookie is a small text file that is downloaded onto your device (e.g. your computer or smartphone) when you access our website that allows us to recognise your advice and store information about your browsing preferences and past actions. 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 Personal Information that we hold from misuse, interference, loss, unauthorised access, modification or disclosure and may hold Personal 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 Personal Information in accordance with our Privacy Procedure. We will periodically review Personal Information that we hold. Where we no longer require such information for any purpose for which the information was collected, and there is no legal reason to keep it, we will take steps to destroy or de-identify the information.

4.3 For individuals in Australia: How do I access and correct my Personal Information?

- (a) We will ensure when Personal Information is collected (on a form or electronically) that we will take steps that are reasonable in the circumstances to notify 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 For individuals in the European Union and the United Kingdom: What are my rights in relation to my Personal Information?

- (a) **Access:** You have a right to access Personal Information held by us about you.
- (b) **Rectification:** You have a right to require us to rectify any inaccurate Personal information held by us about you.
- (c) **Erasure:** You have a right to require us to erase Personal Information held by us about you. This right will only apply where (for example): we no longer need to use the Personal Information to achieve the purpose we collected it for; or where you withdraw your consent if we are using your Personal Information based on your consent; or where you object to the way we process your Personal Information (in line with 4.4(f) below).
- (d) **Restriction of processing:** In certain circumstances, you have a right to restrict our processing of Personal Information held by us about you. This right will only apply where (for example): you dispute the accuracy of the Personal Information held by us; or where you would have the right to require us to erase the Personal Information but would prefer that our processing is restricted instead; or where we no longer need to use the Personal Information to achieve the purpose we collected it for, but you require the Personal Information for the purposes of dealing with legal claims.
- (e) **Data portability:** In certain circumstances, you have a right to receive Personal Information, which you have provided to us, in a structured, commonly used and machine readable format. This right will only apply where the processing is based on consent or a contract (see above) and the processing is carried out by

automated means. You also have the right to require us to transfer this Personal Information to another organisation, at your request.

- (f) **Objection to processing:** You have a right to object to our processing of Personal Information held by us about you where the processing of such Personal Information is necessary for the purposes of our legitimate interests, unless we are able to demonstrate, on balance, legitimate grounds for continuing to process Personal Information which override your rights or which are for the establishment, exercise or defence of legal claims.
- (g) **Automated decision making including profiling:** You have a right not to be subject to a decision based solely on an automated process, including profiling, which produces legal effects concerning you or similarly significantly affect you. Whilst this right applies, VRC does not carry out profiling or automated decision-making.
- (h) **Withdrawal of consent:** You have a right to withdraw your consent where we are relying on it to use your Personal Information (for example, to provide you with marketing information about our services or products).
- (i) The rights above are not absolute and in some circumstances we may be unable to accept your request, in which case we will respond to you to explain why. Requests to exercise your rights above should be sent to our Privacy Officer:

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

#### 4.5 How can I complain about a breach of the Applicable Privacy Laws affecting my Personal Information?

- (a) For individuals in Australia: You may contact the Privacy Officer to discuss any concerns over our handling of your Personal Information by calling 03 8378 0888.
- (b) For individuals in Australia, the EU and the UK: Alternatively, you may lodge a complaint with the Privacy Officer, in writing, by completing a Privacy Complaint Form (Appendix 2) 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

#### 4.6 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).

#### 4.7 If you are unsatisfied with the way we handle any request or complaint by you in relation to your Personal Information you have the right to complain to the privacy regulator:

- For individuals in Australia: [Office of the Australian Information Commissioner](#).
- For individuals in the EU: [List of EU Data Protection Authorities](#).
- For individuals in the UK: [Information Commissioner's Office](#).

## 5. Definitions

**Applicable Privacy Laws** means collectively, the Privacy Act, EU GDPR and UK GDPR.

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

**Australian Privacy Principles** or **APP** means those principles set out in Schedule 1 of the Australian Privacy Act.

**EU GDPR** means Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), as amended from time to time.

**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. Personal Information about an individual includes Sensitive Information about the individual.

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

**Privacy Policy** means the contents of this policy as updated from time to time.

**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.

**UK GDPR** means the Retained Regulation (EU) 2016/679 (UK GDPR) and the Data Protection Act 2018 (DPA 2018), as amended from time to time.

**VRC** means Victoria Racing Club Limited.

## **6. Appendices**

Appendix 1 – Collection, Use & Disclosure of Personal Information Disclosure Document

Appendix 2 – Privacy Complaint Form

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 number &amp; holder</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. Payment details securely	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>details.</b>			& booking confirmation. May be used for direct marketing	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



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>Device ID number, IP address, cookies identifier, website activity</b>	This information is collected when a user visits our websites.	Targeted advertising	The information is used by us or 3 <sup>rd</sup> parties engaged by us to facilitate target advertising or tracking	No personal information is disclosed.	No personal data will be transferred.
<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>Venue – workers and attendees</b>					
<b>Name &amp; contact details, medical alerts, emergency contact &amp; contact details</b>	Induction Acknowledgement of Personal Details Form. Updates and additional information obtained from time to time. Racecourse check-in information collected upon entry.	To evidence completion of induction. To ensure the health & safety of contractors, employees and other individuals at the racecourse.	May be used to monitor incidents & emergencies and to maintain health and safety at our premises.	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

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>Health status (including vaccination status)</b>	Individuals attending the venue (including members, employees, contractors, racing participants and the general public) may be required to provide evidence of vaccination against COVID-19, (or a legal exemption from vaccination)	To protect the health and safety of individuals at the venue and comply with any applicable government and industry requirements.	To maintain health and safety at our premises and comply with any applicable government or industry requirements.	May be disclosed to obtain health and legal advice and as required by law.	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
<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

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>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, contact details, occupation</b>	Diamond rewards membership application	For membership registration	May be used to notify members of offers and for direct marketing	May be disclosed to the TGS (Diamond Rewards Program Host) to conduct industry promotions	Not unless otherwise 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

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>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



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 Applicable Privacy Laws.
2. We can only consider complaints made about an individual’s personal information from the individual themselves (or an authorised representative of that individual).
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 by phone on 03 8378 0888 (for individuals in Australia) or by email at [privacy@vrc.net.au](mailto:privacy@vrc.net.au) (for all individuals).

About you			
<b>Name</b>	Mr/Mrs/Ms/Miss.....		
<b>Address</b>	..... .....		
<b>Telephone:</b>	(....) .....	Mobile	.....
<b>Email Address:</b>	.....		

I want to appoint a representative to act on my behalf	
<b>Name of Representative</b>	Mr/Mrs/Ms/Miss.....
<b>Relationship of Representative to complainant</b>	.....

**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**

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**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.....

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