

# Privacy Policy

**Policy number: LAP01**

## **Date policy was made**

10 March 2016

## **Commencement date of this version**

10 May 2017

## **Purpose**

The purpose of this policy is to:

- (a) detail the circumstances in which GRNSW may collect personal information about an individual and how that information may be used; and
- (b) ensure that GRNSW complies, so far as is practicable, with the requirements of the *Privacy Act 1988* (Cth).

## **Policy**

### **GRNSW is committed to protecting your privacy**

GRNSW understands how important it is to protect an individual's personal information. This document sets out GRNSW's privacy policy commitment in respect of personal information GRNSW holds about individuals and what GRNSW does with that information.

GRNSW recognises that any personal information it collects about you will only be used for the purposes for which it was collected or as allowed under the law. It is important to GRNSW that individuals are confident that any personal information GRNSW holds about them will be treated in a way which ensures protection of the individual's personal information.

GRNSW's commitment in respect of personal information is to abide by the Australian Privacy Principles for the protection of personal information, as set out in the Privacy Act and any other relevant law.

This policy answers the following questions about privacy at GRNSW:

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## Why does GRNSW need your personal information?

In this Privacy Policy **personal information**, is any information that could identify you or be used to establish your identity. This may include information or an opinion about you.

The kinds of personal information GRNSW may collect about you include your name, gender, date of birth, address, telephone numbers, employment history, licence history, occupation, and any other information GRNSW may need to identify you.

GRNSW will only collect health information from you with your consent.

GRNSW collects personal information for the purposes of assessing your application for a licence or registration and for use in connection with the regulation of greyhound racing in New South Wales and other jurisdictions. GRNSW may also collect your personal information for the purposes of direct marketing and managing its relationship with an individual, for example in order to provide a subscription service such as the provision of race form and racing news, together with the issuing of Race Field Information Use Approvals to wagering operators operating on NSW greyhound. From time to time GRNSW may offer an individual other products and services (see section 'Will my personal information be used for Direct Marketing?').

In addition, some laws require GRNSW to collect personal information, these include the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) and the *Corporations Act 2001* (Cth).

GRNSW may also collect information for the purpose of the disclosures set out below (see section 'Who does GRNSW share personal information with?').

### What happens if I do not provide information that has been requested?

It's your choice whether to provide your information. However, if you don't, GRNSW may be unable to fulfil your request for a specific product or service or may not be able to identify you to protect you against fraud. Where you are seeking an application for licensing, it may also affect GRNSW's ability to properly analyse your personal circumstances.

### Will my personal information be used for direct marketing?

GRNSW may also use and disclose your personal information to keep you informed about matters you may find of interest, changes to GRNSW's organisation, or new products or services being offered by GRNSW or any company with which GRNSW is associated.

You can opt out of receiving direct marketing information from GRNSW at any time. You may decline to receive such information by telephoning GRNSW on **(02) 8767 0500** or by writing to GRNSW at **PO Box 170 Concord West NSW 2138** or by emailing **privacy@grnsw.com.au**. If the direct marketing is by email you may also use the unsubscribe function. GRNSW will not charge an individual for giving effect to your request and will take all reasonable steps to meet your request at the earliest possible opportunity.

## What types of personal information does GRNSW collect?

GRNSW may ask for a range of personal information to assist it in providing you with relevant products and services. The information GRNSW may request includes (but is not limited to) name, address, date of birth, contact details, income, assets and liabilities, account balances, bank account details, tax and financial statements, health information, employment details, domicile and citizenship status.

### Does GRNSW collect sensitive information?

GRNSW sometimes needs to collect and use sensitive information. GRNSW will only collect sensitive information about you with your consent. Sensitive information is personal information that includes information relating to an individual's:

- memberships in trade or professional associations or trade unions;
- criminal record; or
- medical history.

Sensitive information may be sought for registration applications and / or investigations into suspected breaches of the GRNSW Rules in the following categories of licence:

- trainers;
- owner / trainers;
- breeders
- attendants;
- owners;
- studmasters;
- AI Approved Person (FSI) and Facility;
- AI Ownership (FSI);
- bookmakers and bookmaker clerks; and
- any other licence categories that are developed by GRNSW.

The Australian Privacy Principles set out restrictions about the way sensitive information can be used.

Unless you give GRNSW your consent, or if GRNSW is required or permitted by law, GRNSW will only use or disclose sensitive information for the purposes for which it was provided.

## **How does GRNSW collect personal information?**

Where reasonable and practical GRNSW will collect personal information directly from you, usually by means of a standard form for the particular category of licence, registration or subscription, or by recording information you provide via telephone calls, interviews and other forms of communication such as CCTV footage and wifi in GRNSW offices, race tracks, GRNSW websites (including portals and databases such as 'MyOzChase' or 'Greyhound Online Services') and mobile device applications (see section Privacy and the Internet for more information).

GRNSW may also collect personal information from external sources. Examples of the people or organisations who may provide GRNSW with information are:

- people authorised by you;
- other racing authorities;
- market research organisations (through surveys or telephone polls);
- veterinarians;
- local councils; and
- Royal Society for the Prevention of Cruelty to Animals NSW (RSPCA NSW)

Personal information may also be collected from the NSW Police with the written consent of the applicant. GRNSW may also collect your personal information from overseas or interstate racing authorities.

## **Can you remain anonymous or use a pseudonym when dealing with GRNSW?**

In most circumstances it will be necessary for GRNSW to identify you in order to successfully do business with you, however, where it is lawful and practicable to do so, GRNSW will offer you the opportunity of doing business with it without providing GRNSW with personal information, for example, if you make general inquiries.

However in many cases it will be impracticable for GRNSW to assist you if you wish to remain anonymous or use a pseudonym. For example, GRNSW is not permitted to issue a licence to a person without first collecting their personal information. Also, the provision of many services is personalised, with the quality and scope of advice dependent on individual circumstances. Because of this, if you choose not to identify yourself or wish to use a pseudonym, GRNSW may be unable to provide you with the specific product or service you want. It may also affect GRNSW's ability to properly analyse your personal circumstances.

## **How does GRNSW update personal information?**

GRNSW realises that your personal information changes frequently. It is important to GRNSW that the personal information GRNSW holds about you is accurate and up to date. During the course of GRNSW's relationship with you, GRNSW may ask you to inform GRNSW if any of your personal information has changed.

In most cases you can alter your details over the telephone. GRNSW will generally rely on you to ensure the information it holds is accurate or complete. If GRNSW believes the information it holds is incomplete or out of date, GRNSW may also seek to correct or complete GRNSW's records by gathering data from other sources such as public records and other organisations.

## How do you access and correct personal information?

Under the Privacy Act you have the right to access the personal information GRNSW holds about you, with some exceptions. You may request access to any of the personal information GRNSW holds about you at any time.

Depending on the type of request that you make, GRNSW may respond to your request immediately. Otherwise GRNSW usually responds within seven days of receiving a request. GRNSW may need to contact other entities to properly investigate a request.

There may be situations where GRNSW is not required to provide you with access to personal information, for example:

- giving access would have an unreasonable impact on the privacy of other individuals;
- giving access would be unlawful as the information relates to existing or anticipated legal proceedings, or where denying access is required or authorised by an Australian law or court order;
- giving access is likely to interfere with law enforcement activities;
- the request is vexatious; or
- both of the following apply:
  - (i) GRNSW has reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to GRNSW's functions or activities has been, is being or may be engaged in; and
  - (ii) giving access would be likely to prejudice the taking of appropriate action in relation to the matter.

GRNSW will provide you with an explanation if GRNSW denies access to the personal information it holds about you.

If any of the personal information GRNSW holds about you is incorrect, inaccurate or out of date you may request that GRNSW correct the information by telephoning GRNSW on **(02) 8767 0500** or by writing to GRNSW at **PO Box 170 Concord West NSW 2138** or by email to **privacy@grnsw.com.au**.

If appropriate GRNSW will correct the personal information at the time of the request, otherwise GRNSW will provide an initial response to you within seven days of receiving a request. Where reasonable, and after investigation, GRNSW will provide you with details about whether GRNSW has corrected the personal information within 30 days.

GRNSW may need to consult with other entities as part of an investigation.

Where applicable, before providing the requested information GRNSW will give you an estimate of any potential costs associated with this, including expenses for locating, retrieving, reviewing and copying any of the material you need.

If GRNSW refuses to correct personal information, GRNSW will provide reasons for not correcting the information.

## **How long will GRNSW keep your information?**

GRNSW may be legally required to maintain some of your records for a significant period of time. However, once GRNSW believes information is no longer required, GRNSW may remove identifying details or destroy the records entirely.

## **Using government identifiers**

If GRNSW collects government identifiers, such as an individual's tax file number, GRNSW will not use or disclose this information other than as authorised by law. GRNSW will never use a government identifier in order to identify an individual.

## **How does GRNSW protect your personal information?**

### **How safe and secure is an individual's personal information that GRNSW holds?**

GRNSW will take a range of measures and reasonable steps to protect an individual's personal information. Whether your personal information is gathered through face-to-face meetings or by interacting with GRNSW via telephone, mail, internet or other methods, GRNSW takes steps to store your information securely. GRNSW holds your personal information in a combination of secure computer storage facilities, paper-based files and other formats.

An individual's personal information will always be stored in a secure environment. GRNSW may store an individual's personal information in paper and electronic form. Information can only be accessed by GRNSW staff on a need to know basis. GRNSW will also take reasonable steps to protect any personal information from misuse, loss and unauthorised access, modification or disclosure.

GRNSW takes a number of steps to protect personal information from misuse, loss, unauthorised access, modification or improper disclosure. These include instructing GRNSW staff and advisers who handle personal information to respect the confidentiality of client information and the privacy of individuals.

For further information on who is permitted to access an individual's records, please contact GRNSW's Privacy Officer whose details are listed below.

### **Who does GRNSW share personal information with?**

From time to time GRNSW may share your personal information with other entities both within and outside of GRNSW. The entities that GRNSW might share your personal information with vary according to the service or issue at hand. GRNSW may disclose an individual's personal information:

- in racebooks and form guides, or for the purpose of the preparation or publication of racebooks and form guides;
- in GRNSW publications, including the Chaser magazine;
- for the purposes of advising of action being taken under the GRNSW Rules;
- if necessary for GRNSW to comply with the requirements of the GRNSW Rules;

- for the purpose of the Integrity Auditor appointed under the *Greyhound Racing Act 2009* (NSW) exercising his or her functions;
- to media agencies as part of the marketing or broadcast of an event or race meeting;
- to the RSPCA NSW, the Animal Welfare League New South Wales or the New South Wales Police Force;
- for inclusion in 'OzChase', other GRNSW portals and databases (including 'MyOzChase' and 'Greyhound Online Services') and to other greyhound racing controlling bodies;
- for the purpose of issuing Race Field Information Use Approvals or in connection with wagering on greyhound racing;
- to the Office of Local Government or any other government agency;
- to associated businesses that may want to market products to the individual;
- to companies that provide information and infrastructure systems to GRNSW;
- to anybody who represents an individual, such as lawyers and accountants;
- to anyone, where the individual has provided GRNSW consent;
- where GRNSW is authorised to do so by law;
- to agents or advisers, or any entity, including but not limited to NSW or Commonwealth government agencies and local councils, that have an interest in GRNSW's business;
- to organisations that provide products or services used or marketed by GRNSW; or
- to an individual's employer, referees or identity verification services.

GRNSW may use cloud storage to store the personal information GRNSW holds about an individual. The cloud storage and the IT servers may be located outside Australia.

### **Is GRNSW likely to disclose personal information to overseas recipients?**

GRNSW may disclose an individual's personal information to overseas racing authorities in certain circumstances, including disclosures to New Zealand. All licensed and registered persons are deemed to have authorised GRNSW to share with, pass on to and collect information from other governing and/or controlling bodies without having to obtain actual consent from the individual. GRNSW will take reasonable steps to ensure that the information which it has transferred will not be held, used or disclosed by the recipients of the information inconsistently with the Australian Privacy Principles. An individual may obtain more information about these entities by contacting GRNSW.

### **How can you contact GRNSW about privacy?**

You can contact GRNSW if you would like to:



- obtain for information about anything contained in this policy, or to request a copy of this policy;
- update or correct your personal information;
- opt out of receiving direct marketing material;
- ask about accessing or correcting the personal information GRNSW holds about you; or
- make a privacy related complaint.

### **What should I do if I have a complaint?**

If you are dissatisfied with how GRNSW has dealt with your personal information, or if you have a complaint about GRNSW's compliance with the Privacy Act, you may contact GRNSW's Privacy Officer on **(02) 8767 0500**.

GRNSW will acknowledge your complaint within seven days. GRNSW will provide you with a decision on your complaint within 30 days.

If you are dissatisfied with the response of GRNSW's Privacy Officer, you may make a complaint to the Privacy Commissioner who can be contacted via the Office of the Australian Information Commissioner website ([www.oaic.gov.au](http://www.oaic.gov.au)) or on 1300 363 992.

### **How do I escalate my concerns?**

An individual may request further information about the way GRNSW manages their personal information by contacting GRNSW:

By email: [privacy@grnsw.com.au](mailto:privacy@grnsw.com.au)

In writing: GRNSW Privacy Officer  
Greyhound Racing New South Wales  
PO Box 170  
Concord West NSW 2138

By telephone: (02) 8767 0500

By fax: (02) 9764 6244

If you still have concerns further assistance may be available from:

The Office of the Australian Information Commissioner

Telephone: 1300 363 992

Website: [www.oaic.gov.au](http://www.oaic.gov.au)

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

## **Privacy and the internet**

This statement outlines some privacy issues specific to the [www.grnsw.com.au](http://www.grnsw.com.au), [www.embracingchange.com.au](http://www.embracingchange.com.au), [www.gapnsw.com.au](http://www.gapnsw.com.au), [www.greenhounds.com.au](http://www.greenhounds.com.au) and [www.thedogs.com.au](http://www.thedogs.com.au) websites (together, the **GRNSW websites**).

The GRNSW websites allows consumers to fill in questionnaires, forms and surveys and subscription services.

## **Interactive tools**

The GRNSW websites and mobile device applications provide you with interactive tools. GRNSW may collect personal information you enter when using the interactive tools on the GRNSW website or through GRNSW applications.

## **What is a cookie and how does GRNSW use cookies?**

Cookies are small pieces of text stored on your computer to help GRNSW determine the type of browser and settings you are using, where you have been on the website, when you return to the website, where you came from, and to ensure your information is secure.

The purpose of this information is to provide you with a more customised and effective experience on the GRNSW websites, including presenting web pages according to your needs or preferences. GRNSW uses cookies for different purposes such as:

- to allocate a unique number to your internet browsers;
- to customise GRNSW's website for you;
- for statistical purposes;
- to identify if you have accessed a third party website; and
- for security purposes.

GRNSW uses cookies to give you access to certain pages of the websites without having to log in each time you visit. GRNSW may also use external service providers to track the traffic and usage on the website.

Cookies are frequently used on many websites on the internet and you can choose if and how a cookie will be accepted by changing your preferences and options in your browser. GRNSW may also use cookies to enhance user experience by providing content and tailored advertising that is relevant to you and your interests.

You may not be able to access some parts of [www.grnsw.com.au](http://www.grnsw.com.au), [www.embracingchange.com.au](http://www.embracingchange.com.au), [www.gapnsw.com.au](http://www.gapnsw.com.au), [www.greenhounds.com.au](http://www.greenhounds.com.au) or [www.thedogs.com.au](http://www.thedogs.com.au) if you choose to disable the cookie acceptance in your browser, particularly the secure parts of the website. GRNSW therefore recommends you enable cookie acceptance to benefit from all the services on the websites.

## **IP addresses**

Your IP address is the identifier for your computer when you are using the internet.

It may be necessary for GRNSW to collect your IP address for your interaction with various parts of the GRNSW website.

## **Online applications**

When you send a completed online application to GRNSW, GRNSW retains the information contained in that application. GRNSW is able to then use that information to provide any services that you require.

You can also suspend and save online applications, so you can complete and send the applications at a later time. If you suspend or save your application, the information that you have entered will be retained in GRNSW systems so that you may recover the information when you resume your application. Online applications that have been suspended or saved may be viewed by GRNSW.

### **Security of information**

The security of your information is very important to GRNSW.

GRNSW regularly reviews developments in security and encryption technologies. Unfortunately, no data transmission over the internet can be guaranteed as totally secure. GRNSW takes all reasonable steps to protect the information in GRNSW systems from misuse, interference, loss, and any unauthorised access, modification or disclosure.

If GRNSW no longer requires your information, and GRNSW is legally permitted to, GRNSW will take all reasonable steps to destroy or de-identify the information.

GRNSW takes reasonable steps to preserve the security of cookie and personal information in accordance with this policy. If your browser is suitably configured, it will advise you whether the information you are sending GRNSW will be secure (encrypted) or not secure (unencrypted).

### **Links to third party websites**

The GRNSW websites have links to external third party websites that may benefit the user. External websites should contain their own privacy statements and GRNSW recommends you review them when using their websites. Please note, however, that third party websites are not covered by this policy, and these sites are not subject to GRNSW's privacy standards and procedures.

### **Disclosure to overseas entities**

GRNSW does not generally disclose personal information obtained from cookies to overseas entities in the course of its activities.

Please contact GRNSW on **(02) 8767 0500** if you would like further information.

### **Website analytics**

Website analytics measurement software is used to assist in tracking traffic patterns to and from the GRNSW websites, anonymously surveying users of the sites. The system is used to collect such information as the number of unique visitors, how long these visitors spend on the website when they do visit, and common entry and exit points into and from the website.

This non-personal information is collected and aggregated by third party software and provided to GRNSW to assist in analysis of GRNSW websites. You cannot be identified personally from this information and no personal information is stored about you.

## **Definitions**

In this policy:

**GRNSW** means Greyhound Racing New South Wales;

**GRNSW Rules** means the GRNSW Greyhound Racing Rules

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

## Relevant legislation and rules

*Companion Animals Act 1998* (NSW)

Companion Animals Regulation 1998 (NSW)

*Greyhound Racing Act 2009* (NSW)

*Privacy Act 1988* (Cth)

GRNSW Greyhound Racing Rules

## Key related documents

GRNSW Employee Code of Conduct

## Amendments to, and operation of, this policy

Any information GRNSW holds is governed by the most current GRNSW Privacy Policy. The Privacy Policy is publically available on the GRNSW website [www.grnsw.com.au](http://www.grnsw.com.au) or you can obtain this Privacy Policy in an alternative format by telephoning GRNSW on **(02) 8767 0500** or by writing to GRNSW at **PO Box 170, Concord West NSW 2138** or by sending an email to [privacy@grnsw.com.au](mailto:privacy@grnsw.com.au)

The policy is reviewed from time to time to take into account new laws and technology, market place practices, changes to GRNSW's operations and practices, and to make sure it remains appropriate to the changing environment. As a consequence GRNSW may change this policy from time to time or as the need arises. GRNSW will post any Privacy Policy changes on its website.

## Policy information

### Effective dates

Date policy was made: 10 March 2016

Commencement date of this version: 10 May 2017

### Policy details

Policy number: LAP01

Date for review: March 2019 or as required

Policy owner: General Counsel

### Revision history

| Version | Date          | Description   |
|---------|---------------|---|
| 1.01    | 10 March 2016 | CEO Approval  |
| 1.02    | 30 May 2016   | Inclusion of gapnsw.com.au                                  |
| 1.03    | 1 August 2016 | Revisions   |
| 1.04    | 10 May 2017   | Updates – online portals, databases and minor style changes |