



Thoroughbred Racing SA Privacy Policy

Introduction

This privacy policy has been developed by Thoroughbred Racing S.A. Limited (TRSA) (ACN 09 447 5939) (ABN 25 094 475 939) as a body corporate established under the Racing Act 1976, TRSA in order to demonstrate its commitment to ensuring your privacy is protected. Being a major part of the Racing Industry in this State we recognise the importance of safeguarding your personal and sensitive information from misuse and disclosure, we think it is important that you know how we treat your information. This Privacy Policy explains how we manage the personal information we collect, use, disclose and how to contact us if you have any further queries about our management of your personal information. This Privacy Policy does not cover personal information collected or held by us about our employees.

Background

From 21 December, 2001, we are required by the Privacy Amendment (Private Sector) Act 2000 (Amendment Act) to comply with ten National Privacy Principles (NPPs) (subject to other provisions of the Act). The NPPs regulate the manner in which personal information is handled throughout its life cycle, from collection to use and disclosure, storage, accessibility and disposal.

Personal Information is information or an opinion, in any form and whether true or not, about an individual whose identity is apparent or can be reasonably ascertained from the information or opinion. Special provisions apply to the collection of personal information, which is sensitive information. This includes information about a person's health, race, ethnic origin, political opinions, membership of political, professional or trade associations, religious or philosophical beliefs, sexual preferences and criminal history.

Collection

We will only collect personal information about you, which is necessary for one or more of our functions and activities. We will not collect information that we do not need. We will only collect personal information by lawful and fair means and not in an unreasonably intrusive manner. When we collect personal information directly from you, we will take reasonable steps at or before the time of collection to ensure that you are aware of certain key matters, such as the purposes for which we are collecting the information, the organisations, or types of organisations, to which we would normally disclose information of that kind, the fact that you are able to access the information and how to contact us.

Generally, when we collect information by means of a standard form for the particular category of licence, registration or subscription and we include a written privacy consent declaration on the form, which sets out the details relative to the collection, use and disclosure of the information.

Occasionally, information will be collected from overseas or interstate governing racing bodies and from publicly available information. When we collect information from a third party we will take reasonable steps to ensure that you are made aware of the details. However, information is usually collected from the applicant and/or from the S.A. Police Service with written consent of the applicant.

Anonymity

In accordance with the spirit of the Amendment Act we will generally provide you with the option of not identifying yourself when you enter transactions, which are lawful and practicable to do so. However, we will not always be able to do this, for example, The Rules of Racing require personal information relative to applications for licenses, registrations, entry forms, stable returns as identification essential for the purposes of mailing subscription and/or renewal notices when they fall due.

Use of Commonwealth Government Identifiers

We will not use Commonwealth Government Identifiers, such as Medicare numbers, as its own identifiers of individuals. We will only use or disclose Identifiers in circumstances permitted by the Amendment Act.

What We Do On-Line To Protect Information

If you decide to utilise our Website to complete and submit an on-line form, the information you enter into the form will be encrypted and collected by us.

Security and encryption technologies are constantly under review. However, no data transmission over the Internet can be guaranteed as totally secure. Although we strive to protect such information, we cannot ensure or warrant the security of any information you transmit to us from our on-line products or services and you do so at your own risk. Upon receipt of your transmission, we take reasonable steps to preserve the security of the information in our systems.

Use and Disclosure

We use the information you provide to enable us to process your application and/or renewal. We will not use or disclose your personal information except for any purpose, which you would reasonably expect us to.

It is a condition of racing that every entry form or stable return shall state the name or names of every person having any share or interest in the ownership or lease of a horse. As this information forms part of the entry for the horse, the names of the owners and lessees are made available to appear in any list of race field, racebooks, form guides and other similar publications. Owners and lessees may not opt out of having their names made publicly available.

The S.A. Racing Calendar is the official racing publication of TRSA and contains various types of notices including trainer, jockey, farrier details, penalties, nominations refused, licenses revoked, suspensions, fines, disqualifications, bleeders, racing colour and special notices. It is a condition of registration that no person may opt out of having their name appear in the calendar in relation to the aforementioned notices. In the case of trainers, riders and rider's agents, at least one contact address and telephone number must be provided.

The information you supply may be passed on to other interstate or overseas governing bodies in certain circumstances. For example, any horse or licensee wishing to race in another jurisdiction must first provide a clearance from us to the governing body. Likewise, on return from another state or country, we require a clearance. Clearances may also contain information including disciplinary records and personal or sensitive information. All owners and registered or licensed persons are deemed to have authorised TRSA to share, pass on and collect information from other governing bodies without having to obtain actual consent from you except, where it involves sensitive information.

On occasions, we use a third party such as a mailing house to provide a service to us. We will only use contractors who agree to adhere to the National Privacy Principles. Where it is possible, we will use appropriate security measures to ensure that contractors deal with the information in accordance with any agreements.

We may, on occasions, provide names and contact details of owners and lessees to various organisations that have a direct connection with racing. However, we will only pass such information to organisations where we are of the opinion that such communication may be of interest or benefit to owners and lessees.

We might also release information to organisations including race clubs and owners or breeders associations. We seek guarantees from those organisations that they will adhere to the National Privacy Principles and that the information will not be used other than for the purpose it had been requested. Owners may opt out of receiving information from these organisations by advising the TRSA Privacy Officer.

Under no circumstances will information be sold to external agencies for marketing purposes.

Where required by law, we provide information to Federal and State Government bodies including Australian Taxation Office. We respond to subpoenas, warrants, court orders or legal processes.

We may disclose information to our legal representatives.

Access Rights

At any time, you can request access to the information that we hold about you. In certain circumstances a reasonable fee may be imposed. We will allow you access and you can correct it or explain something about which you disagree. We may refuse to disclose information if it would impact on another person's privacy, however, we would only do so in situations where we were unable to de-identify that person.

We may deny access to your information if it would compromise legal, investigative and law enforcement activities, as part of an inquiry of suspected unlawful activity or safety concerns.

Access to corporate and/or commercially sensitive decision-making processes will be denied, however, we will explain to you the reason for the decision. Access may be denied if the request is frivolous or

vexatious.

If access is denied on any grounds we may, if requested, agree to the appointment of a mutually agreed intermediary who would be able to meet the needs of both parties.

If you wish to have access to your personal information a written request may be sent to our Privacy Officer. We will respond to your request within 14 days. However, if there are any exceptional circumstances your request may take up to 30 days. We will inform if there is a delay. Identification will be requested prior to any documentation or information being accessed for security reasons.

General Security

The personal information we collect is stored by us in paper form and electronically. We have physical security methods in place to ensure that only authorised personnel have access to our building and limited access is granted to our central and office storage areas.

System security measures are in place to prevent unauthorised access to our system. This is constantly under review by our Information Technology Department.

We have taken all reasonable steps to protect personal information we hold from misuse and loss and from unauthorised access, modification or disclosure.

We will take all reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for any purpose that is permitted by the Amendment Act.. However, some information is required to be kept by the law and the Rules of Racing.

Data Quality

We will take reasonable steps to make sure that the personal information we collect, use or disclose is accurate, complete and up to date. However, the accuracy of that information depends to a large extent on the information you provide. That's why it is important that you let us know if there are any errors in your personal information, and keep us up to date with changes to personal information.

Complaint Handling

We have a complaints procedure in place to investigate privacy complaints in a timely manner. If you believe that your privacy has been breached or if you have any concerns about the manner in which your personal information has been collected or handled by us, you can contact our Privacy Officer.

Contact Us

If you have any queries in relation to privacy, please contact TRSA's Chief Operating Officer, Mr Nick Redin, Thoroughbred Racing S.A. Limited, Morphettville Racecourse, Morphett Road, Morphettville. SA 5043 or GPO Box 2646, Adelaide SA 5001, Telephone 8179 9806, Facsimile 8350 0082, Email marketing@theracessa.com.au

Further Information

If you require further information about the NPPs and the application of the Amendment Act to the private sector generally, this can be found at the Website of the Office of the Federal Privacy Commissioner at www.privacy.gov.au