

**Racing and Wagering Western Australia (RWWA)  
Freedom of Information Statement and Privacy Policy**

**MISSION STATEMENT**

*To provide a positive sustainable future for the Western Australian racing industry.*

*Making our racing great. To position RWWA as a competitive and responsible gambling organisation providing a major source of funding for the development of racing and sports in Western Australia.*

*RWWA's Core Values (Enthusiasm & Pride, Achievement, 'Real'ationships, Team Play and Honesty) and Supporting Behaviours underpin all of our interactions both internally and externally.*

**INFORMATION STATEMENT**

This Information Statement has been prepared pursuant to Part 5 of the *Freedom of Information Act 1992* (WA) (**FOI Act**). It provides direction to the public about RWWA's operations, the types of documentation available and how the public can access that documentation.

**PRIVACY STATEMENT**

Whilst not subject to the *Privacy Act 1988 (Cth)* (**Privacy Act**) and the Australian Privacy Principles, RWWA understands that its customers value their privacy and expect their affairs to be kept confidential. RWWA has therefore developed its Privacy Policy along the lines of the Australian Privacy Principles in relation to the collection, use, storage and disclosure of personal information it collects about individuals. Therefore this Information Statement has been expanded to include, not only the statutory requirements of the FOI Act, but also the RWWA Privacy Policy.

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## 1. Introduction

RWWA is established under the *Racing and Wagering Western Australia Act 2003 (WA)* (**RWWA Act**). The RWWA Act established RWWA as the controlling authority for thoroughbred, harness and greyhound racing in Western Australia, with the responsibility for off-course TAB wagering. The Western Australia TAB has been a major part of the State's social fabric for over sixty years, injecting millions of dollars into the community by managing an efficient and effective wagering and gaming business.

Thousands of Western Australians have gained significant long-term benefit from the TAB's financial contribution to the State, particularly the sporting fraternity. Through creative marketing, state of the art technology and continued stakeholder support, RWWA will continue to provide a world class betting service to its customers and maintain and improve upon its significant financial contribution to the State's sporting and racing communities for the overall benefit of all Western Australians.

## 2. Details of Legislation Administered

The principal legislation governing RWWA is:

- Racing and Wagering Western Australia Act 2003
- Racing and Wagering Western Australia Regulations 2003
- Betting Control Act 1954 (WA)
- Betting Control Regulations 1978
- Racing Restriction Act 2003 (WA)
- Racing Bets Levy Act 2009 (WA)
- Gaming and Wagering Commission Act 1987 (WA)

Other legislation to which RWWA must comply with includes the following. This list is not exhaustive, but represents the legislation that impacts on the general operation of RWWA.

- Racing Penalties (Appeals) Act 1990 (WA)
- Freedom of Information Act 1992 (WA)
- State Record Act 2000 (WA)
- Corruption and Crime Commission Act 2003 (WA)
- Occupational Safety and Health Act 1984 (WA)
- Work Health and Safety Act 2020 (WA)
- Equal Opportunity Act 1984 (WA)
- Financial Management Act 2006 (WA)
- Unclaimed Money Act 1990 (WA)
- Public Interest Disclosure Act 2003 (WA)
- Statutory Corporations (Liabilities of Directors) Act 1996 (WA)
- Workers Compensation and Injury Management Act 1981 (WA)
- Criminal Code Act 1913 (WA)
- Fair Trading Act 2010 (WA)
- Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth)
- Criminal Code Act 1995 (Cth)
- Superannuation Guarantee (Administration) Act 1992 (Cth)
- Fair Work Act 2009 (Cth)
- Competition and Consumer Act 2010 (Cth)
- Interactive Gambling Act 2001 (Cth)

- Copyright Act 1968 (Cth)
- Trade Marks Act 1995 (Cth)
- Spam Act 2003 (Cth)

Legislation, together with commercial principles, RWWA's Statement of Corporate Intent and Strategic Policies governs the operation of RWWA.

### 3. Organisational Structure and Decision-Making Functions

The organisational structure of RWWA is based on a corporate model comprising a number of divisions which oversee the varying activities of the organisation. The organisational structure is shown below (Diagram 1) following which is an outline of the role of each business unit.

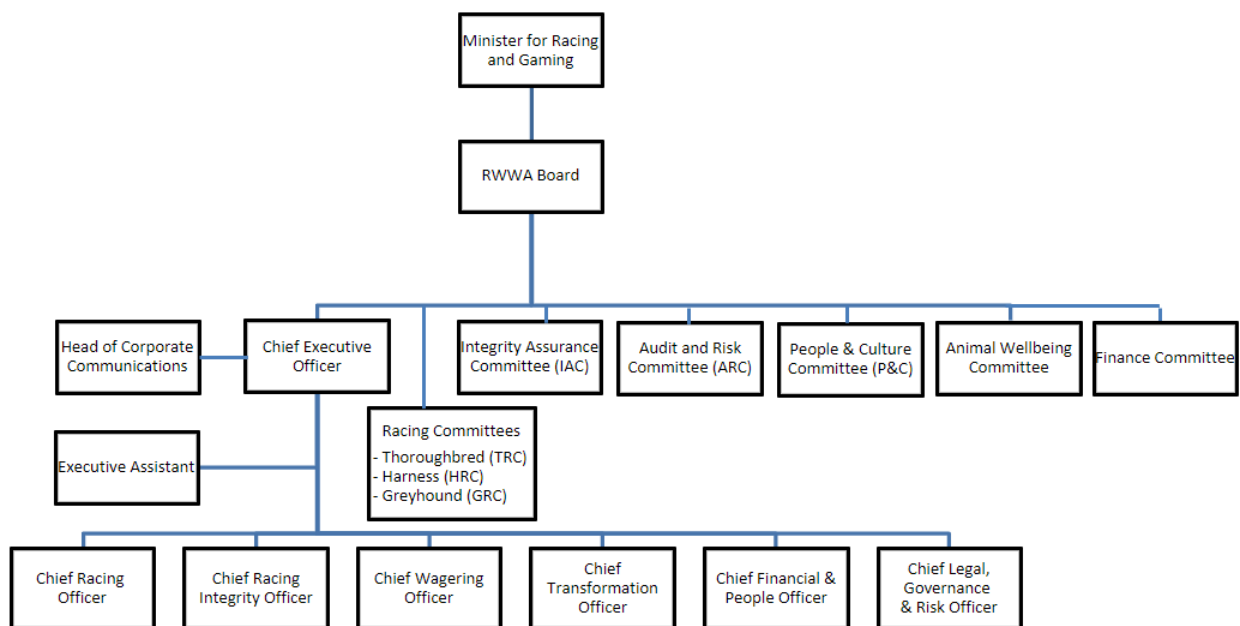


Diagram 1: Organisational Structure of the RWWA 1 December 2021

**RWWA Board:** Board members are approved by the Minister for Racing and Gaming following nomination by the eligible bodies and in accordance with the provisions of the RWWA Act. The Board's role is to set policies and strategies for the future direction of the organisation and to make decisions necessary to meet RWWA's objectives and performance targets.

**Thoroughbred Racing Committee (TRC):** Makes recommendations to the Board for endorsement in relation to the specialised functions in relation to thoroughbred racing (strategy and planning) in accordance with its Charter.

**Harness Racing Committee (HRC):** Makes recommendations to the Board for endorsement in relation to the specialised functions in relation to harness racing (strategy and planning) in accordance with its Charter.

**Greyhound Racing Committee (GRC):** Makes recommendations to the Board for endorsement in relation to the specialised functions in relation to greyhound racing (strategy and planning) in accordance with its Charter.

**Integrity Assurance Committee (IAC):** The RWWA Act provides for the establishment of an Integrity Assurance Committee (IAC) within RWWA. The IAC has primary oversight of those aspects of RWWA's functions that relate to; stewards, drug testing and control, licensing and registration, handicapping and racing appeals.

**Audit and Risk Committee (ARC):** The audit committee plays an important role in providing oversight of the RWWA's governance, risk management, and internal control practices. The ARC performs the role of RWWA's Audit Committee and has oversight for the Internal Audit Function and Risk Management and other Legislative Compliance including Anti Money Laundering and Counter Terrorism Financing. The ARC also reviews and approves the Annual Report.

**People & Capability Committee (P&C):** Oversees and reports on remuneration for the CEO, bonuses for staff and executive and allowances for committee members, the nomination process for the recruitment, appointment and development of the Board and Committees, in accordance with its Charter.

**Animal Wellbeing Committee (AWC):** Oversees welfare strategy that guides RWWA in fulfilling our commitment to safeguard the welfare of equine and canine athletes.

**Finance Committee (FC):** Assists the Board in monitoring, reviewing and making recommendations on matters associated with investment and finance policies strategies and decisions; significant acquisitions, joint ventures and divestments; asset management; and financial performance

**Chief Executive Officer:** The CEO is appointed by the Board to manage the day-to-day operations of RWWA including strategy, risk and business continuity systems, wagering compliance, audit and legal functions.

**Finance:** This division is responsible for financial management, business intelligence functions, including data mining and strategic analysis, and a variety of other business services. The division has continued to provide wide ranging support to the organisation in the achievement of goals and objectives whilst maintaining a focus on prudent financial management and on improving efficiency and effectiveness

**Racing:** The racing division is responsible for racing operations including fixture planning, of licensing and registration of racing participants/animals, racing systems and information maintenance, handicapping and grading, programming, stakes supervision, vision contracts, industry consultation, country club promotion, racing industry development, control of RWWA-owned animal industry training venues, major event support and the overall strategic direction of the racing industry in Western Australia. The division also encompasses industry training, media, marketing and communication services.

**Wagering:** The primary responsibilities of this division are electronic wagering, retail administration, all TAB contractual arrangements and administrative functions, all wagering race day services, management of all RWWA (TAB) owned and leased properties and telephone betting operations. This division is responsible for the delivery of wagering revenue through product and distribution channel initiatives

**Wagering Marketing:** Is responsible for all activities associated with the RWWA trading brands for racing and wagering divisions to position and promote them in the marketplace. In addition it looks after corporate communications, Government Relations and RWWA's program of Corporate Responsibility

**People and Capability:** The People and Capability division is responsible for the development and implementation of human resource management strategy and effective management of all related workplace and employee relations functions across the organisation.

**Racing Integrity:** The Division includes Stewards from all three codes and Racecourse Investigators and is responsible for all matters pertaining to the proper conduct and integrity of racing in Western Australia.

**Technology & Transformation:** The Technology and Transformation Division is responsible for providing technical, consulting and support services for the day-to-day delivery of wagering services throughout Western Australia. The division provides technical support services for all RWWA wagering and racing information systems, ticket machines, the data communications network, information security, project delivery, TAB Radio and all wagering related technical infrastructure.

**Legal, Governance & Risk:** Responsible for leading and advising on legal, governance and risk matters including internal audit, compliance, insurance and general legal matters.

#### **4. Public participation in the Formulation of Policy and Performance of RWWA**

RWWA conducts regular forums with Agents, customers, racing consultative bodies and racing industry bodies to enable frank and open exchange of comments and views on matters relating to the conduct of RWWA's business. An association representing the interests of TAB Agents has been established to liaise with the TAB on matters concerning the Agency network and Agent's generally.

#### **5. Documents held by RWWA**

RWWA has a number of publications that are freely available to the public. These include:

- Annual Reports, dating back to 1961 (Reports from 2000/01 are available on the RWWA website)
- Racing Industry Status reports (Reports from 2003/04 are available on the RWWA website)
- Statement of Corporate Intent (Reports from 2010/11 are available on the RWWA website)
- A broad range of brochures and publications describing various bet types (available from the Head Office or any TAB Agency), information about the TAB and services and products provided
- Race results dating back to 1961 (available from the Head Office)
- TAB Internet site – [www.tabtouch.com.au](http://www.tabtouch.com.au)
- TAB mobile site – [www.tabtouch.mobi](http://www.tabtouch.mobi)
- RWWA website – [www.rwwa.com.au](http://www.rwwa.com.au)

RWWA maintains standard statutory information and records required for the commercial operation of the business and personnel functions. These fall into the following categories and are not freely available to the public:

Account & Audits	Administration – General	Advertising
Agencies	Agents	Betting & Sports Betting
Boards & Committees	Cleaning	Clubs & Associations
Communications	Correspondence	Dividends
Equipment	Finance – Banks	Grants – Clubs
Greyhounds	Harness	Insurance
Land & Buildings	Legal	Legislation
Marketing	Ministerial	New Initiatives

Projects	Racing	Reports
Research	Sales	Security
Staff	Strategic Planning	Taxation
Tenders	Totalisators – On-Course	Transport

Should a member of the public wish to obtain a document(s) that is not freely available (including an application to access documents containing personal information about them or a close relative) they can do so by lodging an application in accordance with the Freedom of Information Act, with the FOI Coordinator (see section 6)

Any records that are destroyed are done so in accordance with the General Disposal Authorities issued by the State Records Office (including DA 2015-003: Sector Disposal Authority for Racing, Gaming & Wagering, and Liquor Regulators) and RWWA's Retention and Disposal Schedule.

## **6. Implementation of the Freedom of Information Act**

### **6.1 Legislative Requirements**

RWWA is required to comply with the provisions of the Freedom of Information Act 1992 (WA) (**FOI Act**). The FOI Act gives people a general right of access to documents held by all state and local government agencies including RWWA . The FOI Act:

- confers upon individuals a right to apply for access to certain information and documents held by RWWA;
- confers upon individuals a right to apply to RWWA for amendment to their personal information to ensure that personal information in RWWA's documents is accurate, complete, up to date and not misleading; and
- places certain obligations on RWWA to make publicly available certain information about its operations.

Consideration of all FOI applications at RWWA is dealt with in accordance with the FOI Act and guidance published by the Office of the Information Commissioner WA.

Exempt Matter: There are exemptions for some types of documents including protection of essential public interest, the personal or business affairs of third parties, legal professional privilege and the deliberative processes of Government or agencies. Access can be granted to part of a document where it contains exempt material and that material can be deleted.

### **6.2 RWWA FOI Coordinator**

RWWA has appointed a Freedom of Information Coordinator with responsibility for ensuring RWWA's compliance with the FOI Act and dealing with FOI applications. The Freedom of Information Coordinator is the Chief Legal, Governance & Risk Officer.

### **6.3 Lodging an Application**

RWWA aims to make documents available quickly and efficiently, and when possible, documents will be provided outside of the FOI process.

When an individual seeks to make an FOI application, the application must:

- be lodged in writing;
- provide enough details to enable the requested documents to be identified;
- provide an Australian address to which notices can be sent; and
- be lodged with RWWA as set out below, with any application fee payable.

All FOI applications and queries should be directed to the Freedom of Information Coordinator on one of the following addresses:

**Postal Address:**

Freedom of Information Coordinator  
Racing and Wagering WA  
14 Hasler Road  
Osborne Park WA 6017

**Email:** [receptionstaff@rwwa.com.au](mailto:receptionstaff@rwwa.com.au)

**Phone:** (08) 9445 5333

**Fax:** (08) 9244 5914

### **Amendments to Personal Information**

An individual may apply to have personal information about them amended if it is inaccurate, incomplete, out-of-date or misleading. The onus is on the applicant to satisfy RWWA that information requires amendment.

Minor changes to personal contact details may be done over the phone by contacting the Customer Service Centre on 1300 363 688. If the amendment is accompanied by a request for the Account Security Code to be sent to an individual, a written request to amend the record will be required.

Individuals acting on behalf of the person to which the records relate may apply for amendment of the record. Certain people, including legally appointed guardians or someone exercising a power of attorney, may make applications on behalf of children and/or adults. Where an affected person to whom the information relates is deceased, a close relative (spouse, children, parents, sibling, grandparent or uncle/aunt in order of closeness) may make an application in their absence.

Applications to amend personal information about the applicant must:

- be in writing
- give enough details to enable the document that contains the information to be identified
- give as much detail of the matters in relation to which the person believes the information is inaccurate, incomplete, out of date or misleading
- give the person's reasons for holding that belief
- give details of the amendment that the person wishes to have made (i.e. by altering

- information, striking out or deleting information, inserting information, inserting a note in relation to the record, or in two or more of those ways)
- give an address in Australia to which notices under the FOI Act can be sent
- give any other information or details required under the *Freedom of Information Regulations 1993*
- be lodged at RWWA's head office.

As soon as possible, but in any case within 30 days, applicants will be provided with a Notice of Decision, which will inform:

- the decision to amend the information
- the reasons for the decision
- the right of appeal or review
- the right to request that a notation be added to the document, disputing the accuracy of the information.

If RWWA determines that it will amend the record it will do so by altering it, striking out, deleting, or inserting information or a note in relation to the contents.

### **Access to Personal Information**

Individuals may request to see documents containing personal information RWWA holds about them through a FOI application. An individual seeking access to personal information will be required to provide photographic proof of identification. .

### **6.4 Fees and Charges**

There is no application fee payable for access to personal information. However for all other requests there is fee of \$30.00.

The fees and charges that may be levied for an FOI application (excluding personal information) include:

- Application Fee: \$30.00 (must be paid before the application can be considered)
- Photocopies: \$ 0.20 per page
- Staff Time (1): \$30.00 per hour (per hour, or pro rata for a part of an hour) (dealing with the application)
- Staff Time (2): \$30.00 per hour (per hour, or pro rata for a part of an hour) (supervising access to documentation)
- Transcribing from tape, film or computer: \$30.00 (per hour, or pro rata)
- Duplicating a tape, film or computer information: Actual Cost
- Delivery, packaging and postage: Actual Cost

If the additional charges are likely to exceed \$25.00 RWWA will advise the applicant to determine whether they wish to proceed with the application. Alternatively the applicant can request an estimate of the charges prior to lodging an application.



An advance deposit may be required pursuant to section 18(1) of the Act, which will be 25% of the estimated charges for the FOI application which will be payable in excess of the application fee. A further advance deposit may be required to meet the charges for dealing with the application. The applicant will be advised at the time where a deposit will be required.

For financially disadvantaged applicants or those holding valid prescribed pensioner concession cards the charges may be discounted by 25%.

## **6.5 RWWA FOI Decision-making process**

Where an applicant is having difficulty defining what documents they are seeking access to the RWWA FOI Coordinator can assist the applicant with their application. The applicant should use the list of record categories outlined in Section 5 to assist them to determine what documents they want access to. Better clarification of the scope of the application will reduce the time and cost involved in processing.

RWWA may refuse to deal with an application on the basis that it will divert a substantial or unreasonable portion of its resources away from other operations. Nevertheless RWWA will take all reasonable measures to assist the applicant to better define the application and narrow the scope of the application.

Once the scope of the application is determined, the FOI Coordinator will assess the application in accordance with the FOI Act and approve (either in full or an edited version) or refuse the release of the documents requested. In all circumstances the applicant will be given a written Notice of Decision as soon as possible and no later than 45 days of the date of lodgement. The Notice of Decision will include the following information:

- the date on which the decision was made
- the name and the designation of the officer who made the decision
- if the document is an exempt document the reasons for classifying the matter exempt
- the fact that access is given to an edited document
- reasons if the application is refused or only partial access is given
- information on the right to review and the procedures to be followed to exercise those rights.

Applicants who are dissatisfied with an FOI decision are entitled to seek an internal review by the RWWA's Internal Review Committee, comprising the Chief Executive Officer and the Chief Racing Officer. Applications for review must be made within 30 days of receiving the Notice of Decision, in the same manner as set out in section 6.3.

Following an internal review the Internal Review Committee will consider the application and within 15 days of receipt of the application for review issue a further Notice of Decision as to whether to release or not release the document or part thereof. If the applicant is not satisfied with this decision they may appeal to the Information Commissioner for an external review within 60 days of receiving the Notice of Decision. Any appeal to the Information Commissioner for external review must be accompanied by a copy of the Notice of Decision. Further information is available here: [www.oic.wa.gov.au](http://www.oic.wa.gov.au).

Where access to documents is granted RWWA will let the applicant see the document(s) and if requested provide a photocopy. In some cases another form may be more appropriate, such as listening to a tape recording or watching a video. If for some reason copies of the document cannot be made and sent to the applicant RWWA will discuss with them the most appropriate way in which the document can be examined.

A diagram setting out the RWWA FOI process is set out below:

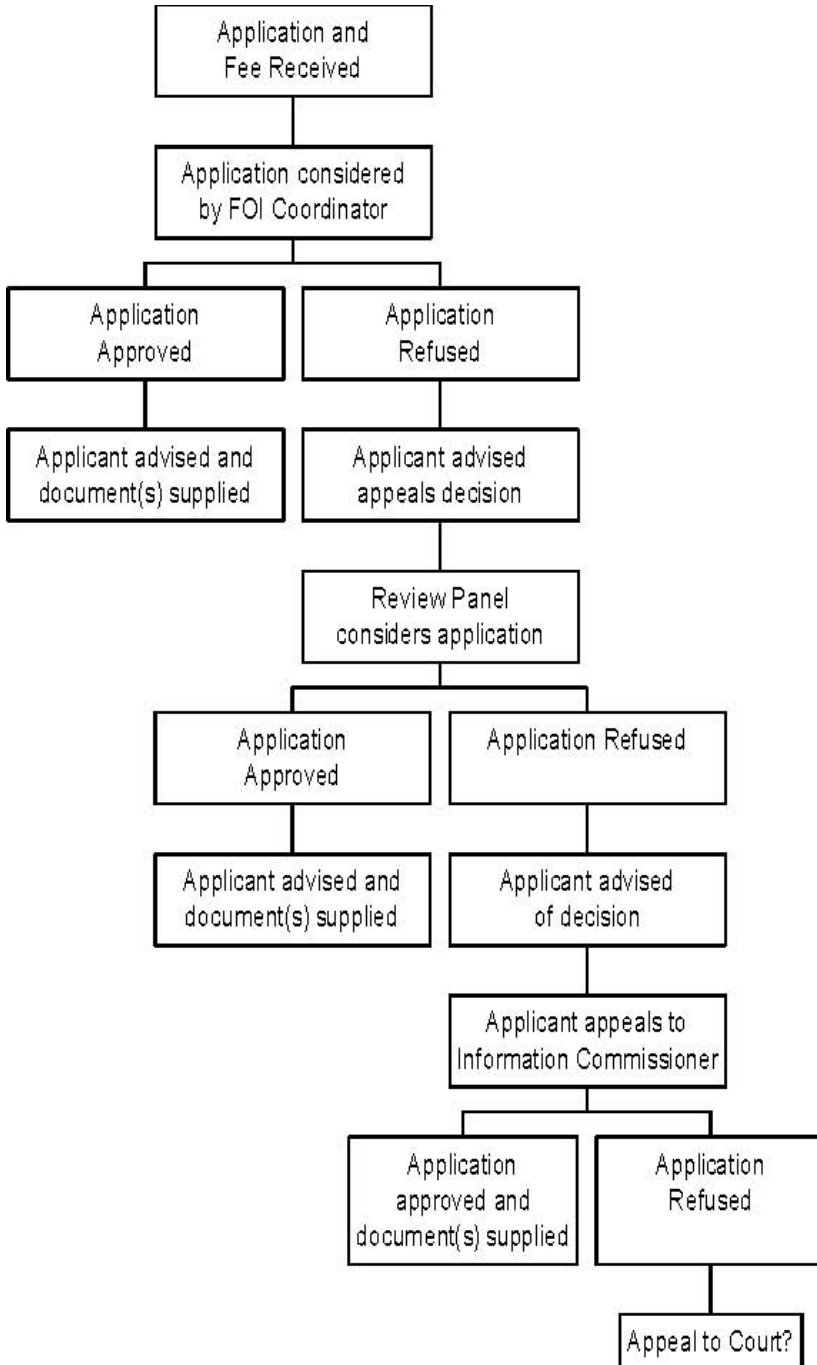


Diagram 2: FOI decision-making process at RWWA

## **7. Privacy Policy - Introduction**

By virtue of its enabling legislation, the provisions of the *Privacy Act 1988* (Cth) (**Privacy Act**) do not bind RWWA nor does it bind TAB Agents. However RWWA takes seriously its obligation to safeguard personal information about individuals who conduct business with RWWA (such as Customers, Agents, Employees and Contractors). Therefore RWWA has determined that the Australian Privacy Principles contained in the Privacy Act (**APPs**) will be used to guide RWWA in how it collects and manages personal information about individuals, but do not bind RWWA.

RWWA has appointed a Privacy Coordinator with responsibility for overseeing the implementation and promotion of privacy and freedom of information issues within the organisation and with individuals who conduct business with RWWA. The Privacy Officer is the Chief Legal, Governance & Risk Officer.

This privacy policy outlines how RWWA will use the APPs as a guide to dealing with personal information in its daily operations. Should there be a conflict between the requirements of the FOI Act and this privacy policy, the provisions of the FOI Act will prevail. RWWA is required to comply with the *State Records Act 2000* (WA) and has in place policies and standards relating to management of its records, which this privacy policy is subject to. This privacy policy will strengthen RWWA's commitment to managing personal information in a responsible and lawful manner.

### **7.1 Open and Transparent Management of Personal Information**

RWWA will be open and transparent in how it collects, uses and manages personal information and will ensure that records management practices are adhered to. RWWA will only solicit and collect personal information that is reasonably necessary for, or directly related to, one or more of its functions or activities.

RWWA collects the following types of personal information when collected from individuals:

- Identity Details
- Contact Details
- Bank Details
- Employment Details
- Call Centre Telephone Recordings

RWWA collects personal information for the following purposes:

- To open, maintain or otherwise transact on a betting account
- To comply with the law
- To communicate with customers
- To market, manage and enhance its services

RWWA will endeavour to ensure that all personal information it collects from an individual is stored in a secure manner. Unless otherwise permitted by law, where RWWA wishes to use personal information for a purpose, which has not been previously disclosed to an individual, it will advise the individual and where necessary seek consent. Use and disclosure of personal information will at all times comply with this privacy policy and the FOI Act.

Personal information can be accessed and amended if necessary by making application through the FOI process. Personal information may be disclosed to overseas recipients such as race clubs but only in relation to legitimate racing integrity related matters.

RWWA will generally not use or disclose Government Identifiers (such as a Medicare Card or Driver's Licence) other than for the purpose of verifying an identity when opening a betting account (or where required to transact on a betting account in compliance with the law).

## **7.2 Anonymity and Pseudonymity**

Where it is lawful and practicable to do so, individuals may conduct business with RWWA (such as through a retail outlet) without providing personal information or having their personal details disclosed. However in order to conduct business with RWWA electronically (i.e. internet mobile or telephone of which telephone calls are recorded) or through a betting account, personal information must be provided.

## **7.3 Collection of Solicited Personal Information**

The Act defines personal information as information or an opinion that can identify a person. RWWA collects personal information about Customers, Contractors (Suppliers), Agents, Registered Racing participants and Employees for its activities and functions. How and why this information is collected depends on what dealings a person may have with RWWA. For example, RWWA may require information from a customer in order to open a betting account (e.g. production of identification documents), comply with the law, communicate with customers and market, manage and enhance its services.

Information is generally collected directly from a person when opening a betting account, lodging an application for employment, being appointed as an Agent or being engaged through a contract. RWWA regards this information as sensitive and will only use it for the purpose it was provided and to meet its legal obligations (unless the individual agrees otherwise) and will only disclose it where required to do so by law.

RWWA also collects personal information from its website and mobile site/apps ([www.tabtouch.com.au](http://www.tabtouch.com.au) and [www.tabtouch.mobi](http://www.tabtouch.mobi)) through receiving account betting applications and emails. At the point of registration the customer can opt not to receive marketing information from RWWA.

## **7.4 Unsolicited Personal Information**

Where RWWA receives any unsolicited personal information RWWA will assess if it would be entitled to collect that personal information and if not RWWA will destroy or de-identify the information as soon as practicable.

## **7.5 Notification of the Collection of Personal Information**

Individuals are made aware of the requirement to provide personal information at the time it is collected and provided with the opportunity to review RWWA's privacy policy. This includes providing awareness of:

- The purpose for collection of personal information; and
- The consequence of failing to provide the information

## **7.6 Use and Disclosure of Personal Information**

RWWA undertakes a number of functions that require it to use and disclose the personal information it collects. RWWA will only use or disclose personal information for the purpose which was either specified or reasonably apparent at the time it was collected. RWWA may use personal information for the following reasons:

- Required or authorised under a written law;
- Communicating changes to the 'Terms or Conditions' of the relationship between RWWA and the individual;
- Internal accounting and administration;
- Helping RWWA build a better relationship with its customers;
- Regulatory reporting and compliance;
- In RWWA's opinion, necessary in order to prevent or minimise loss, damage or injury to RWWA or any other person;
- To assist it in connection with any investigation or other action conducted under a sporting authority's applicable betting or anti-gambling laws or rules for its sporting events;
- Made to a Principal Racing Authority to assist in the conduct of a legitimate racing integrity investigation pursuant to a race field use and approval arrangement;
- Identifying and informing customers about RWWA's products and services that may be of benefit to them; and
- In the course of discharging its Principal Racing Authority/Controlling Body duties in accordance with the Rules of Racing.

Where RWWA wishes to use or disclose personal information in other circumstances it will use all reasonable endeavours to obtain the consent of the person concerned, other than in exceptional circumstances such as where:

- It is necessary to protect any person and/or RWWA's rights or property; or
- The secondary use or disclosure is required or authorised by or under an Australian law or a court/tribunal order.

RWWA will not sell and will not generally make available personal information to other organisations. The only circumstances in which other organisations may be given access to personal information are when contractors and service providers are engaged to operate a particular business function (such as a company which helps maintain computer systems), it is required by law or RWWA requires advice from its professional advisers. Generally, however, personal information is defined as "exempt" matter under the FOI Act and therefore such information will not be disclosed unless the person, to whom the information relates, agrees.

## **7.7 Direct Marketing**

RWWA will not use the personal information that it holds about an individual for the purpose of direct marketing without the individuals express or implied consent.

Any permitted direct marketing by RWWA will allow an individual to request not to receive future direct marketing communications by using the 'Opt Out' option available with every direct marketing communication.

## **7.8 Cross Border Disclosures**

As a general rule information about an individual is not transferred overseas unless in the case of an overseas based person who requests personal details be sent to them. Where information is required to be transferred overseas for a purpose other than individual transaction details, this will only occur in circumstances where information has appropriate protection and the law permits it or where approval from the person concerned is forthcoming.

## **7.9 Use or Disclosure of Government Identifiers**

RWWA is required by law to independently verify the identity of every individual that applies to open a betting account. An individual may use a government identifier (such as a Medicare Card, passport or Driver's Licence) as a form of identification. RWWA will not use or disclose these identifiers other than for the purpose of satisfying an identity check when opening a betting account unless:

- It is required to do so by a state or federal government law;
- It is allowed to do so under regulations that allow the use or disclosure of the identifier.

## **7.10 Quality of Personal Information**

RWWA places great importance on ensuring that information it holds about individuals is accurate, complete, up-to-date and not misleading. To this end RWWA takes all reasonable endeavours to confirm the accuracy, completeness and currency of personal information when the information is collected and before it uses or discloses the information. If the personal details of an individual change they are required to notify RWWA of that change as soon as practicable. Account customers can update their personal information using the online preferences once logged into their account.

## **7.11 Security of Personal Information**

RWWA takes reasonable steps to protect personal information it collects including:

- Confidentiality conditions for employees and contractors (contractors are required to sign confidentiality agreements where they have access to personal information);
- Document storage security policies and restricted physical access to records;
- Strict security measures restricting access to information held, stored or transmitted electronically;
- Providing a discreet environment for confidential discussions;
- Only allowing access to personal information where the individual seeking access has satisfied RWWA's identification requirements; and
- Access control for the main head office building.

Personal information is generally held on secure IT servers or stored in controlled environments which can only be accessed by authorised staff and access is logged and monitored. RWWA staff are not permitted to use personal information for any purpose other than as permitted under this privacy policy.

To the extent permitted by law, where RWWA no longer needs personal information for any purpose for which the information may be used or disclosed under this privacy policy, RWWA will take reasonable steps to destroy the information or ensure that it is de-identified.

### **7.12 Access to and Correction of Personal Information**

Individuals may request access to documents containing personal information or corporate information held by RWWA in accordance with the FOI Act. Applications for access for information must be directed to RWWA's FOI Coordinator as outlined at section 6 above.

### **7.13 Data Breach Notification**

A 'Data Breach' is "unauthorised access to, unauthorised disclosure of, or loss of, personal information held by an entity" where "the access, disclosure or loss is likely to result in serious harm to any of the individuals to whom the information relates".

Where data is accessed, disclosed or lost but robust encryption is in place this will not be deemed to be a Eligible Data Breach.

Where an Eligible Data Breach occurs RWWA will notify the individuals whose data has been affected by an Eligible Data Breach within 30 days of the breach being detected. RWWA will undertake review of the security risks to personal information held by RWWA and the consequences of a breach of security including review of information and data handling policies and procedures.

Contact Customer Service on 1300 363 688 for further information or to obtain a copy of this document go to [www.rwwa.com.au](http://www.rwwa.com.au) or [www.tabtouch.com.au](http://www.tabtouch.com.au).

RWWA reserves the right to change this document at any time and notify its customers and stakeholders by posting or displaying an updated version on its website or in retail outlets. It is an individual's responsibility to regularly review the policy. Conducting business with the RWWA constitutes an acceptance of the Freedom of Information Statement and Privacy Policy and any changes posted.

## **RWWA PRIVACY STATEMENT**

Racing and Wagering Western Australia (RWWA) is established under the Racing and Wagering Western Australia Act 2003. Being a state authority RWWA is specifically excluded from the provisions of the Privacy Act 1998 (Cth) and as such, RWWA is not bound by the Australian Privacy Principles. Notwithstanding this, RWWA understands that its customers value their privacy and expect their affairs to be kept confidential. On this basis, RWWA's policy is to respect the confidentiality of customer information except where disclosure of the information is-

- Required or authorised under a written law;
- Communicating changes to the 'Terms or Conditions' of the relationship between RWWA and the individual;
- Internal accounting and administration;
- Helping RWWA build a better relationship with its customers;
- Regulatory reporting and compliance;
- In RWWA's opinion, necessary in order to prevent or minimise loss, damage or injury to RWWA or any other person;
- To assist it in connection with any investigation or other action conducted under the sporting authority's applicable betting or anti-gambling laws or rules for its sporting events;
- Made to a Principal Racing Authority to assist in the conduct of a legitimate racing integrity investigation pursuant to a race field use and approval arrangement;
- Identifying and informing customers about RWWA's products and services that may be of benefit to them; and
- In the course of discharging its Principal Racing Authority/Controlling Body duties in accordance with the Rules of Racing.

<b>Open and Transparent Management of Personal Information</b>	RWWA will be open and transparent in how it collects, uses and manages personal information and will ensure that records management practices are adhered to. RWWA will only solicit and collect personal information that is reasonably necessary for, or directly related to, one or more of its functions or activities.
<b>Anonymity and Pseudonymity</b>	Where it is lawful and practicable to do so, individuals may conduct business with RWWA (such as through a retail outlet) without providing personal information.
<b>Collection of Solicited Personal Information</b>	RWWA collects personal information about individuals and manages it in a sensitive manner. How and why this information is collected depends on what dealings a person may have with RWWA.
<b>Unsolicited Personal Information</b>	Where RWWA receives any unsolicited personal information RWWA will assess if it would be entitled to collect that personal information and if not RWWA will destroy or de-identify the information as soon as practicable to the extent permitted by law.
<b>Notification of the Collection of Personal Information</b>	Individuals are made aware of the requirement to provide personal information at the time it is collected and provided with the opportunity to review RWWA's privacy policy.
<b>Use and Disclosure of Personal Information</b>	RWWA undertakes a number of functions that require it to use and disclose the personal information it collects. Except as otherwise permitted or required by law or with consent, RWWA will only use or disclose personal information for the purpose which was either specified or reasonably apparent at the time it was collected.



Racing and Wagering Western Australia: Freedom of Information Statement and Privacy Policy

<b>Direct Marketing</b>	RWWA will not use the personal information that it holds about an individual for the purpose of direct marketing without the individuals express or implied consent.
<b>Cross Border Disclosures</b>	Personal information will not be transferred overseas unless it relates to an overseas-based customer who has requested that information or information is required to be transferred overseas for a legitimate purpose in circumstances where appropriate protection and the law permits.
<b>Use or Disclosure of Government Identifiers</b>	RWWA will generally not use or disclose Government Identifiers (such as a Medicare Card or Driver's Licence) other than for the purpose of verifying an identity when opening a betting account and as required by law.
<b>Quality of Personal Information</b>	RWWA will endeavour to confirm the accuracy, completeness and currency of personal information when it is collected and prior to use or disclosure.
<b>Security of Personal Information</b>	RWWA will endeavour to ensure that personal information it collects is stored in a secure manner. RWWA staff are not permitted to use personal information for any purpose other than as permitted under this privacy policy and as required by law.
<b>Access to and Correction of Personal Information</b>	Individuals may request to see documents containing personal information RWWA holds about them through a Freedom of Information Application. Minor changes to personal contact details may be done over the phone by contacting the Customer Service Centre on 1300 363 688
<b>Further Information</b>	Contact Customer Service on 1300 363 688/ (08) 9445 5333 for further information to obtain a full copy of the Privacy Policy or go to <a href="http://www.rwwa.com.au">www.rwwa.com.au</a> or <a href="http://www.tabtouch.com.au">www.tabtouch.com.au</a> .