

Ebet Gaming Systems Pty Limited

ebet

PRIVACY POLICY

Document Version Control

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1. Privacy at Ebet

This Privacy Policy applies to Ebet Gaming Systems Pty Limited (ABN 50 086 218 831) and its subsidiaries (Ebet, we, our, us) that are subject to the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs). It explains how we collect, use, disclose, store, and protect personal information in accordance with the APPs, and how you can exercise your rights under the Privacy Act.

This policy forms part of Ebet's Integrated Management System (IMS), through which we monitor privacy practices, update controls, and review this policy at least annually and whenever significant changes occur as part of our continual improvement cycle. It complements Ebet's internal Privacy Management, Data Protection, and Data Retention policies.

2. Application

This policy applies to personal information handled in connection with our websites, products, applications, services, customer support, training programs and business operations.

Personal information is information, or an opinion, about an identified individual, or an individual who is reasonably identifiable.

We apply data minimisation, collecting and retaining only the personal information necessary for stated purposes.

2.1. Children and minors

Ebet does not knowingly collect personal information from individuals under 18 years of age, except where required or authorised by law, or where appropriate parental or guardian consent has been obtained. If you believe we have collected personal information from a minor in error, please contact us using the details below so we can take appropriate action.

3. Your agreement

We encourage you to read this policy so you know how we handle your personal information.

It applies when you:

- use any Ebet website or application;
- sign up for an Ebet product, service, or training;
- provide services to Ebet; and
- share personal information with us in any way.

We may update this policy from time to time and if we make significant changes, we will provide reasonable notice before they take effect.

4. Information we collect and hold

The personal information we collect depends on your dealings with us and our legal obligations. It may include:

- **General Contact Details:** name, residential and email address, phone number, date of birth.
- **Workforce Information:** qualifications, employment history, next-of-kin; where required by law or role, background checks (e.g., criminal history or sanctions), and for payroll/compliance, tax and superannuation details.
- **Supplier Information:** name, position, business contact details; due-diligence background information (including sanctions screening and, if applicable, criminal history checks) necessary for contractual or regulatory requirements.
- **Customer and Training Information:** details provided when acquiring Ebet products or enrolling in training programs, such as name, contact information, date of birth, and, where required for government reporting, limited sensitive information.
- **Technical and Usage Data:** session duration, pages accessed, browser type, referral URL, device/OS.
- **Marketing and Preferences:** responses to promotions, interests, and communication preferences.
- **Security and Compliance Data:** video surveillance footage at certain premises for safety, compliance, and incident response.

We note that we generally do not collect **Credit Card Details**. Where payments are processed, card details are handled by secure external payment providers under their own privacy policies.

4.1. Sensitive information

Some personal information we collect may be classified as sensitive information under the Privacy Act 1988 (Cth). Sensitive information includes information about an individual's criminal history, biometric information, health information, or other information defined as sensitive by law, such as criminal history checks for compliance roles or biometric data used for secure access.

We only collect sensitive information where it is reasonably necessary for our functions or activities, required or authorised by law (including for regulatory or licensing purposes), or with your consent. Where collected, sensitive information is handled with additional safeguards consistent with the Australian Privacy Principles.

5. How we collect personal information

We usually collect personal information directly from you, for example, through our websites, apps, by phone, mail, or in person. Sometimes we collect it from third parties when it is not practical to get it from you or when required by law (for example, from referees, recruiters, your employer, related companies, training providers, regulators or government authorities).

6. AML/CTF and identity verification

Ebet is subject to obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) (AML/CTF Act) and related laws.

Where required for compliance purposes, Ebet may verify the identity of individuals acting on behalf of our customers, suppliers, partners, or other business counterparties. This may include collecting and using personal information such as your name, residential address, and date of birth.

With your explicit consent, Ebet may disclose limited personal information (being your name, residential address, and date of birth) to a credit reporting body or identity verification service solely for the purpose of verifying your identity. This information is not used for credit assessment and does not result in a credit report being generated.

If your identity cannot be verified using this method, we will inform you and offer alternative verification options where available. You may also opt out of identity verification using a credit reporting body by contacting Ebet Customer Support or your Ebet business contact.

Personal information collected or used for AML/CTF and identity verification purposes is handled in accordance with this Privacy Policy and is retained only for as long as required by law or our regulatory obligations.

7. Why we collect, use and hold personal information

We collect, use and hold personal information to:

- identify you;
- provide, manage and improve our products, services and training programs;
- perform customer, supplier and workforce administration;
- conduct research and analysis;
- personalise experiences and marketing (where permitted);
- comply with laws and licence conditions;
- protect our rights, property and safety; and
- for any other purpose required or permitted by law.

8. How we disclose personal information

We disclose personal information to employees and contractors (under confidentiality obligations) and to service providers that support our operations (e.g. payment processors, data centre and cloud providers, CRM providers, auditors, legal advisers, call centres, market research and analytics, training support). We may disclose to regulators, law enforcement and sports integrity bodies where required or permitted by law, and to our related bodies corporate for legitimate purposes. Third-party engagements involving personal information include contractual privacy and security obligations, with assurance activities proportionate to risk.

If responsibility for providing an Ebet product or service transfers to another business, or we stop providing a product or service, we may disclose relevant personal information to a replacement provider so the service can continue or a similar service can be offered to you. You may withdraw consent to such disclosure at any time.

9. Data use and privacy

Ebet may access and use system-generated data, including venue and product performance data, for troubleshooting, product improvement, diagnostics, and regulatory compliance.

Ebet may need to access personal information relating to venue patrons (consumers) when assisting venues with configuration, troubleshooting, or support services for Ebet products. Such access is limited to what is necessary for the support task and will not be used for Ebet's own purposes unless the information has been de-identified in accordance with applicable privacy laws.

Ebet complies with all applicable privacy laws, including the Australian Privacy Principles (APPs), and takes reasonable steps to protect the confidentiality and integrity of any data accessed.

10. Marketing and preferences

We may use your information to send you updates about events, training, promotions, offers and new products or services via email, SMS, phone or other channels and will ask for your consent prior to any such communication where required.

You can opt out at any time by following the instructions in our messages or emailing privacy@ebetsystems.com.au.

If you agree to receive marketing from Ebet, we may send you communications about selected partner offerings that are relevant to our products or services. Ebet does not sell personal information to third parties.

You can withdraw your consent to receive marketing communications at any time by following the opt-out instructions in the message or by contacting us using the details below.

11. Loyalty and venue programs

Ebet does not operate consumer loyalty programs. Any loyalty programs offered by venues are managed by those venues under their own privacy policies.

12. Cookies and analytics

Our websites and applications may use cookies and similar technologies to operate, remember preferences, and understand usage. You can delete or block cookies in your browser settings, however doing so may impact functionality.

We may collect anonymised statistical and technical information for product development and performance purposes. Where third-party analytics tools (e.g., Google Analytics) are used, these providers may collect data under their own privacy policies.

13. Disclosure of personal information overseas

We will not disclose personal information to an overseas recipient unless permitted by the Privacy Act 1988 (Cth) and the APPs. Where disclosure is necessary, we take reasonable steps to ensure the recipient protects the information consistently with the APPs, including contractual privacy and security clauses, pre-engagement due diligence, and proportionate ongoing assurance activities.

14. Security of personal information

We take reasonable precautions to protect personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure. These include role-based access controls, encryption of sensitive data, secure development and testing practices, and backup/recovery mechanisms. Our Data Protection Policy guides how we apply technical

and organisational safeguards, and our Data Retention Policy governs retention and secure disposal.

In the event of a data breach that is likely to result in serious harm to individuals, Ebet will comply with its obligations under the *Notifiable Data Breaches* scheme, including notifying affected individuals and the Office of the Australian Information Commissioner (OAIC) where required by law.

Our information security controls are aligned with Ebet's Integrated Management System (IMS) and ISO/IEC 27001 practices, and staff complete privacy awareness training appropriate to their roles.

15. Access to and correction of personal information

You have the right to request access to your personal information or ask us to correct it if it is inaccurate, incomplete, or out of date. We will respond within a reasonable timeframe (usually within 30 days) and may ask you to provide proof of identity. There is no charge to make a request, although we may recover reasonable costs if compiling the information involves significant effort. If we are unable to grant your request, we will explain why and outline the options available to you, which may include seeking further clarification or making a complaint.

16. Monitoring phone calls

Phone calls to Ebet may be recorded for regulatory, verification, or quality purposes, and we will let you know at the start of the call if it is being recorded.

Call details may be shared with enforcement agencies, regulators, or external advisers if required or permitted by law.

17. How long we keep personal information

We retain personal information only for as long as needed for authorised purposes or as required by law. When no longer required, we take reasonable steps to destroy or de-identify personal information in accordance with our Data Retention Policy.

18. Making a complaint

If you are concerned about how we have handled your personal information, please let us know so we can address the issue.

Please send your complaint in writing, and we will respond within a reasonable timeframe (usually within 30 days). If we cannot resolve your concern, you may contact the Office of the Australian Information Commissioner (OAIC) for assistance.

19. Contact us

The person assigned responsibility for privacy matters is functionally referred to as the 'Privacy Officer' throughout Ebet's privacy-related policies. This is an assigned role within Ebet and not a dedicated position.

- Privacy Officer
Ebet Gaming Systems Pty Limited
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Email: privacy@ebetsystems.com.au