



PRIVACY POLICY

Our Privacy Policy outlines the commitment of Chesapeake Software Pty Ltd (ACN 665 812 760) trading as BetWonderland and its Subsidiaries (“BetWonderland” or “we”, “us” or “our” or “Company”) to protect the privacy of our customers’ personal information and other personal information we receive in the conduct of our business.

This privacy policy applies to our customers in Australia and New Zealand.

This privacy policy applies to our Australian websites and Apps but does not apply to linked third party websites and Apps that we do not operate.

We comply with all relevant privacy laws, including the requirements applicable to us under the Australian Privacy Act 1988 (Privacy Act) and relevant State laws.

OUR PRIVACY POLICY

Our Privacy Policy sets out how we look after personal information. It explains the kinds of personal information that we collect, and why we collect it. It also describes how we hold, use, and disclose personal information.

When you open an account with us, you agree to the terms of our Privacy Policy.

By using our websites and Apps, or by providing personal information to us, you also agree to the terms of our Privacy Policy.

When you agree to the terms of our Privacy Policy, you consent to the collection, use, storage and disclosure of that information as described in our Privacy Policy.

THE PERSONAL INFORMATION THAT WE COLLECT

We collect personal information in the provision of our affiliate platform services, including the marketing of our affiliate platform services. We collect personal information so that we can provide products, services and information to our customers.

In this Privacy Policy, the term “personal information” has the meaning in the Privacy Act 1988 (Cth) and under that legislation includes information about an identifiable and living individual, including names, addresses, telephone numbers, email addresses, photographs, dates of birth, credit and banking details and if and where applicable, includes information that constitutes “sensitive information”.

We also collect information where we are required to do so by law or as a condition of third party bookmaker licenses to who we provide services.

The types of personal information we collect depends on the circumstances in which the information is collected. The types of personal information we collect may include:

- Your name and contact details
- Identification details, such as date of birth
- Identification verification information, such as your passport or drivers licence information that you provide to us to verify your identity



- Information regarding your use of our products and services
- How you make payments to us, and how we make payments to you, such as your banking and payment details. This could include bank account and debit or credit card details.
- Your or your customers betting history with third party bookmakers who we provided services
- Records of communications and dealings with you, such as emails, SMS, telephone, live chat and in-person communications
- Information regarding your use of our websites and Apps
- Location information
- Financial information, including information about your financial circumstances and source of income
- Information we may collect as part of a survey, customer feedback request or a competition
- Information that you provide to us, for example, for verification or as evidence in respect of a complaint
- Information and opinions about you that are provided to us by others, such as banks and regulators

We collect information about people who are our suppliers and business partners, or who are employed by our suppliers and business partners. The information we collect is that which we need to do business with that party.

We collect information about people who visit our offices and attend our events. This may include photographs and video.

We may record and monitor telephone calls and other communications between you and us for training, quality control, verification and compliance purposes.

When you communicate with us, we may collect additional information including the languages you speak and how best to manage communications with you.

Subject to the terms of this policy, you consent to our collection, storage, use, disclosure, protection and handling of your personal information on the terms and conditions of this policy.

RESTRICTIONS

If you are under the age of 18, we need the consent of your parent or guardian to process your personal information.

ONLINE SERVICES

When using our online services, including our websites and Apps, we and our technology partners may collect information about you and how you use our online services.

We may collect information such as:

- user name and password
- which services you use and how you use them
- device information, such as the model and ID of the device you use, operating system, telephone number and mobile phone network
- server log information, such as details of how you used the service, IP address, hardware settings, browser type, browser language, the date and time of your use and referral URL
- information that may uniquely identify your browser or your account
- location information.

If you visit our website or use our Apps, we collect information on your use of the website or App, such as pages visited, links clicked, text entered, and mouse or cursor movements, as well as information more commonly collected such as the referring URL, browser, device, operating system, and Internet Protocol ("IP")



address. We may use publicly available sources to approximate your geographic region and Internet Service Provider based on your IP address.

We use various technologies to collect and store information, including cookies, pixel tags, local storage, such as browser web storage or application data caches, databases, and server logs. These technologies help us track your usage and remember your preferences.

For example, cookies are small files that store information on your computer browser, TV, mobile phone or other device.

We use Cookies to help us to improve our site and to deliver a better and more tailored service, for instance by storing information about your preferences and allowing us to recognise you when you return to our site.

When individuals use our mobile application, we may also collect information about your city location, device model and version and operating system version. (This is typically not considered “personal information”).

No attempt is made by the Company to use Cookie Information to personally identify you. However, if Cookie Information is linked with personal information as set out above, this Cookie Information becomes personal information and will be treated in the same manner as the personal information to which it has been linked.

If you choose, you can set your browser to reject cookies or you can manually delete individual cookies or all of the cookies on your computer by following your browser’s help file directions. Turning off cookies may also disable functions of many websites you visit. You can disable cookies but our online services may not work as intended if you do so.

Our online services may contain links to other websites. We are not responsible for the privacy practices or the content of other websites. The privacy practices applicable to other websites may differ substantially from ours. Please read the privacy policy of any other websites you visit before using them.

We do not accept responsibility for the content or practices of websites operated by third parties that are linked to from or that link to our websites.

Third party cookies

In some cases, third parties may place cookies through this platform. For example:

- Google Analytics, one of the most widespread and trusted Platform analytics solutions, may use cookies de-identified data about how long users spend on this site and the pages that they visit;
- Google AdSense, one of the most widespread and trusted Platform advertising solutions, may use cookies to serve more relevant advertisements across the web and limit the number of times that a particular advertisement is shown to you; and
- third party social media applications (e.g., Facebook, Twitter, LinkedIn, Pinterest, YouTube, Instagram, etc) may use cookies in order to facilitate various social media buttons and/or plugins in this platform.

SENSITIVE INFORMATION

Sensitive information includes information about your health, racial or ethnic origin, religious beliefs and criminal record.

Usually, we don’t collect sensitive information. If we need to do so, we will only collect sensitive information about you with your consent and where it is reasonably necessary for us to do so, or if we are otherwise allowed or required by law to collect that information. If you provide us with sensitive information, we will consider that you have consented to us collecting it.



HOW WE COLLECT PERSONAL INFORMATION

Personal information is collected in a number of ways, including:

- directly from you, for example, when you give it to us, when you enter your personal details on our websites or Apps, when you open an account or update your account details, or when you complete an entry form for a competition or participate in a survey
- when you use our products or services, including from your use of our websites and Apps
- when you email, text or telephone us, engage in live chat or when you share information with us from other social applications, services, websites or Apps
- when you interact with our websites, Apps, online content and advertising
- when you visit or offices or attend our events, for example, you may be photographed or captured on CCTV
- from publicly available sources of information, including third parties from whom we may acquire lists
- from third parties, such as banks, regulators, payment channel providers or your family members

If you choose not to provide us with information, we may be unable to supply products or services to you.

ANONYMISATION OF DATA

We may collect anonymised wagering data that is collected via our suite or products. We may also use this anonymised data to generate additional insights or for analytical purposes to improve the platform.

USE OF PERSONAL INFORMATION

We may use and disclose your personal information for the following purposes:

- to provide our products and services to you
- to provide our products and services to third party wagering bookmakers
- to identify you and to assist you to obtain and use our products and services
- to consider your eligibility for our products and services
- to administer and manage our services including opening and the ongoing settlement of your affiliate account
- to complete transactions with you
- to respond to inquiries from you
- to provide you with customer support
- to monitor and detect possible fraud or breaches of our terms and conditions of service
- to ensure that our products and services are used in a legal and responsible manner
- to ensure that you and your account with us complies with all relevant laws and your contractual obligations to us
- to conduct appropriate checks to detect fraud
- to process payments
- to improve our products and services
- to conduct research
- for security purposes, including to perform functions that we believe are necessary to protect the security and proper functioning of our websites and Apps
- to comply with our legal obligations, resolve disputes, and enforce agreements
- to investigate or pursue a legal claim
- to administer surveys, contests, or other promotional activities or events sponsored or managed by us or our business partners
- to make special offers related to our products and services



- to gain an understanding of your needs to provide you with better and more personalized products and services tailored to your requirements
- to promote and market our products
- to assist in the enforcement of laws
- to report to our directors and shareholders
- to maintain and update our records
- to determine whether to hire you to work for us
- as otherwise required or authorised by law; or
- for any other purpose reasonably considered necessary or desirable by the Company in relation to the operation of our business with your prior consent.

All members and others with whom we interact have the option of opt-out of receiving marketing communications from us. If you do not wish to continue to receive electronic marketing communications from us and/or selected third parties you should opt-out by clicking on the “unsubscribe” link in any email communications that we might send you.

COLLECTING INFORMATION FROM THIRD PARTIES

We may also collect information about you from other people (e.g., a third-party administrator or other users) or independent sources. If you also give us permission to access information in other services, such as Facebook or Google Drive, Apple or Dropbox, we may be able to obtain information from those accounts depending on your privacy settings.

A Third Party will collect personal identification information at sign-up (for verification in line with our regulatory compliance requirements) and when depositing monies (via a Third-Party integration as further outlined below).

Please note that wherever possible we will seek to collect personal information only from you. We will only look to other means wherever it is unreasonable or impractical to collect the information from you directly. Where the Company has collected your information from a third party, such personal information will be held, used and disclosed by the Company in accordance with this Privacy Policy.

DIRECT MARKETING & UNSUBSCRIBE

We may use and disclose your personal information to carry out consumer, market, community and product research, compile demographics and perform other analysis so that we can develop and implement initiatives to improve our products and services.

We may use and disclose your personal information for marketing purposes. To communicate account and promotional information to you, you may be contacted by us via a number of means including e-mail, SMS and phone communications, push notifications, social media posts or chats, hardcopy mail and other means. Should you not wish to receive marketing communications of this nature, you may unsubscribe or opt-out:

- by following the link or instructions in the communication
- by contacting our Customer Service team to update your communication preferences
- by changing the marketing preference settings for your account in our App.

If you unsubscribe from marketing communications, this will not stop you receiving service-related communications from us if we are otherwise legally entitled to send them to you. In some circumstances, if your account is closed or inactive for a period of time, we will stop communications with you.



DISCLOSURE OF PERSONAL INFORMATION

We may disclose your personal information:

- to and between our Subsidiaries and our related bodies corporate
- to third parties who assist us with the provision of our products and services
- to government agencies, regulators and law enforcement bodies
- to AUSTRAC
- to insurance companies
- to racing and sporting bodies
- to a court or tribunal
- to wagering bookmakers
- to anyone who acquires or considers acquiring our assets or business (or part of it)
- to a person who serves us with a subpoena or other legal document requiring us by law to disclose information or documents about you to them
- to our consultants, contractors, subcontractors, suppliers, service providers and professional advisors, who assist us in operating our business, for example to payment service providers, providers of our Card programs (including EML and Mastercard), companies that provide identification verification services (such as Green ID and Equifax), customer analytics providers, mail house operators, banks, investigators, and organisations that we engage to deal with you on our behalf.

Sometimes, we disclose personal information to a third party who has the right to use our brand or logo. The third party may provide products or services, or operate a website or App, but these are not our products, services, websites or Apps. We do not accept responsibility for the privacy practices of the third parties in these circumstances.

INFORMATION PROVIDED TO PAYMENT GATEWAY PROVIDERS

All transactions that are made through our platform are processed securely and externally by one or more third party payment gateway providers. Unless you expressly consent otherwise, we do not see or have access to any personal information that you may provide to such third-party payment gateway providers, other than information that is required in order to process your order (e.g., your name, email address and billing address).

ACCESS BY REGULATORY, RACING AND SPORTING BODIES

In accordance with the rules of racing and other obligations in various jurisdictions, betting transactions conducted over the Internet and by telephone with which we have access (including but not limited to telephone calls, as well as transactions to and from an individual's computer) may be observed and recorded by us and by the relevant regulatory, racing or sporting body.

Additionally, these bodies may be granted access to review personal information collected by us for reasons including but not limited to ensuring the integrity of racing, sporting and other events. These bodies may not be located in Australia.

DURATION OF RETENTION OF DATA

We will only keep your data for as long as is necessary for the purpose for which it was collected, subject to satisfying any legal, accounting or reporting requirements. At the end of any retention period, your data will either be deleted completely or anonymised (for example, by aggregation with other data so that it can be used in a non-identifiable way for statistical analysis and business planning). In some circumstances, you can ask us to delete your data.



THIRD PARTIES

The Platform may contain links to third party Platforms including the networks of our valued wagering service providers and/or advertisers.

If you follow a link to any of these Platforms, note that they have their own privacy policies. If you use our Platform to link to another site you will be subject to that site's terms and conditions of use and Privacy Policy. We strongly encourage you to view these before disclosing any of your personal information on such sites.

We do not control, and does not accept any responsibility or liability for, the Privacy Policy of, and use of personal information by, any party other than us, including any user of the Platform and the operators of any Platform to which the Platform links. We do not share your personal information with those Platforms.

Re-marketing

We may use the Google AdWords and/or Facebook re-marketing services to advertise on third party Platforms to previous visitors to this platform based upon their activity on this platform. This allows us to tailor our marketing to better suit your needs and to only display advertisements that are relevant to you. Such advertising may be displayed on a Google search results page or a Platform in the Google Display Network or inside Facebook. Google and Facebook may use cookies and/or pixel tags to achieve this. Any data so collected by Google and/or Facebook will be used in accordance with their own respective privacy policies. None of your personal Google and/or Facebook information is reported to us.

You can set preferences for how Google advertises to you using the Google Ads Settings page (<https://www.google.com/settings/ads>). Facebook has enabled an AdChoices link that enables you to opt out of targeted advertising.

GDPR

The Company welcomes the General Data Protection Regulation ("GDPR") of the European Union ("EU") as an important step forward in streamlining data protection globally. We intend to comply with the data handling regime laid out in the GDPR in respect of any personal information of data subjects in the EU that we may obtain.

GDPR rights

The requirements of the GDPR are broadly similar to those set out in the Privacy Act and include the following rights:

- you are entitled to request details of the information that we hold about you and how we process it.
- For EU residents, we will provide this information for no fee;
- you may also have a right to:
 - o have that information rectified or deleted; o restrict our processing of that information;
 - o stop unauthorised transfers of your personal information to a third party;
 - o in some circumstances, have that information transferred to another organisation; and
 - o lodge a complaint in relation to our processing of your personal information with a local supervisory authority; and
- where we rely upon your consent as our legal basis for collecting and processing your data, you may withdraw that consent at any time.

If you object to the processing of your personal information, or if you have provided your consent to processing and you later choose to withdraw it, we will respect that choice in accordance with our legal obligations. However, please be aware that:



- such objection or withdrawal of consent could mean that we are unable to provide our services to you, and could unduly prevent us from legitimately providing our services to other customers/clients subject to appropriate confidentiality protections; and
- even after you have chosen to withdraw your consent, we may be able to continue to keep and process your personal information to the extent required or otherwise permitted by law, in particular:
 - to pursue our legitimate interests in a way that might reasonably be expected as part of running our business and which does not materially impact on your rights, freedoms or interests; and
 - in exercising and defending our legal rights and meeting our legal and regulatory obligations.

Data that we collect about you may be stored or otherwise processed by third party services with data centres based outside the EU, such as Google Analytics, Microsoft Azure, Amazon Web Services, Apple, etc and online relationship management tools.

We consider that the collection and such processing of this information is necessary to pursue our legitimate interests in a way that might reasonably be expected (e.g., to analyse how our customers/clients use our services, develop our services and grow our business) and which does not materially impact your rights, freedom or interests.

The Company requires that all third parties that act as “data processors” for us provide sufficient guarantees and implement appropriate technical and organisational measures to secure your data, only process personal data for specified purposes and have committed themselves to confidentiality.

SECURITY AND STORAGE

We may store customer information (including personal information and credit information) in a variety of formats, including electronic or paper formats.

If you are a customer, it is important for you to protect against unauthorised access to your password and to your computer. You should have a unique and complex password and make sure to regularly update your operating system. You should use the latest version of our App. You must not disclose your password to others.

We take measures to enhance the security of our websites and Apps. The security of your personal information is important to us.

We take reasonable steps to ensure that your personal information is stored securely. Transmissions sent to or from our websites and Apps are routinely monitored for quality control and systems administration. We cannot guarantee the total security of any data transmission over the Internet, however, we strive to protect your personal information.

A number of physical, administrative, personnel and technical measures are used to protect your personal information, including restricting access to offices, databases and firewalls to keep personal information secure from misuse, loss or unauthorized use.

Although due care is taken, we cannot guarantee the security of information provided to us via electronic means or stored electronically. No security measures are perfect and we cannot promise to be able to withstand security threats in all circumstances.

In light of this, we cannot and do not ensure or warrant the security or privacy of your personal information, including payment and bank account details. You transmit your personal information to us at your own risk.

You are entirely responsible for maintaining the security of your passwords and/or account information.



ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

You have the right to access, update and correct the personal information that we hold about you.

If you would like to access the personal information that we hold about you, please let us know by sending an email to the Customer Service Manager. We will provide you with a copy of your personal information within a reasonable period after the request is made, usually within 30 days. In some cases, we may charge a reasonable fee to provide access to your personal information, but we will never charge you a fee to make a request. If a fee applies, we will advise you before we provide access. Sometimes, we may not be able to provide you with access to all of your personal information and, where this is the case, we will tell you why. We may also need to verify your identity when you request your personal information.

We take reasonable steps to ensure the personal information we hold about you is accurate, complete, up-to-date, relevant, and not misleading.

If you would like to make an update or correction to any personal information we hold about you, please let us know by sending an email to the Customer Service Manager.

If there is a reason for not granting you access to your information or making a correction to any personal information, we will provide you with a written explanation of the reasons for the refusal (unless unreasonable to do so) and inform you of the mechanisms to complain about the refusal.

WARRANTIES AND REPRESENTATIONS

This Privacy Policy does not constitute a contractual representation, promise, guarantee or warranty by us to you as to the manner in which we will or may collect, store, use, disclose, protect or otherwise handle your personal information. Some matters are beyond the Company's control, such as third party malicious or criminal attacks.

FURTHER INFORMATION AND COMPLAINTS

For further information, or if you would like to make a complaint about our use, handling or disclosure of your personal information, please contact our Customer Support team or refer your complaints in writing to affiliates@betwonderland.com.au. Following receipt of your complaint, we will investigate and respond to you within a reasonable period of time.

If you are not satisfied with our response, you may also contact the relevant regulator such as the Australian Information Commissioner. As at the date of this Privacy Policy, the contact details are as follows:

Office of the Australian Information Commissioner

GPO Box 5218

Sydney NSW 2001

Phone: [1300 363 992](tel:1300363992)

Email: enquiries@oaic.gov.au

Online: <https://www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint>

If you would like more information about the Privacy Act or Australian privacy requirements in general, please visit the Office of the Information Commissioner's website at www.oaic.gov.au.



SEVERABILITY

Any provision of this Privacy Policy which is void or unenforceable may be severed from this Policy without affecting the enforceability of other provisions.

WAIVER

Any failure or delay by us to enforce or exercise a power or right or provisions of this Policy will not constitute a waiver of those rights or provisions, and the exercise of a power of right by us does not preclude our ability to exercise that or any other power or right in the future. All rights not expressly granted are reserved.

JURISDICTION AND GOVERNING LAW

This Privacy Policy is governed by, and must be construed according to, the law in force in the State of Victoria, Australia. The Courts in that State will have the exclusive jurisdiction to determine disputes in relation to this Privacy Policy or any other matter concerning the operation of the Platform.

CHANGES TO THIS POLICY

We regularly review this Privacy Policy and our privacy practices.

From time to time, we will change this Privacy Policy. If we do, we will update the Privacy Policy on our websites. The changes will come into effect immediately upon notification on our websites.

If the changes are significant, we will aim to provide customers with an email or text notification of the changes.

You should check our website from time to time to understand how the current version of our Privacy Policy applies to you.

Last updated on: 1 August
2023

Version 1