

Darwin Turf Club/Thoroughbred Racing Northern Territory

SURVEILLANCE DEVICES PRIVACY POLICY

About this Policy

Version 1.1, March 2019

The Darwin Turf Club and Thoroughbred Racing Northern Territory (“TRNT”) are committed to the promotion of the Sport of Racing in Darwin. The *Privacy Act 1988* requires entities bound by the Australian Privacy Principles (“APPs”) to have a clear and accessible privacy policy. This policy outlines our ongoing obligations to you in respect of how we manage your Personal Information. Darwin Turf Club and Thoroughbred Racing Northern Territory employees, prospective employees and those entering the area around Bevan Halter Avenue in the Darwin Turf Club’s premises at Dick Ward Drive, Fannie Bay NT 0820 (“The Premises”) as trainers, horse-owners, guests, licence holders or stakeholders of the Darwin Turf Club should also refer to our Track Regulations, Stable Agreement and Optical Surveillance Devices Policy.

This policy adopts the language of the APPs and a copy of the principles may be obtained from the website of the Office of the Australian Information Commissioner at www.aoic.gov.au.

This policy is written in simple language. The specific legal obligations of the Darwin Turf Club and TRNT when collecting and handling your personal information are outlined in the *Privacy Act 1988* and in particular in the APPs found in Schedule 1 of the *Privacy Act 1988*. This policy will be updated when our information handling practices change. Updates will be published on our website and through our email lists to all those who will be affected by the changes.

A copy of this policy can be found on our website and will be provided upon request.

Overview

We collect, hold and use Personal Information to carry out all necessary functions and activities to ensure that the sport of Horse Racing in Darwin and all those who participate in the sport, are held to the highest standard of integrity. The information collected will also be used to ensure security, safety and wellbeing of all trainers, horse-owners, license holders and stakeholders of Darwin racing and to ensure the welfare of all animals participating in the sport of racing.

Collection of Personal Information

What is Personal Information and why do we collect it?

Personal Information is information that is capable of identifying an individual or an opinion about an identified individual, or an individual who is reasonably identifiable.

The main way in which Personal Information will be collected at the Premises is through the use of the optical surveillance devices installed along Bevan Halter Avenue and on the external facia of stable blocks. For regulatory and security reasons there are a number of optical surveillance cameras monitoring our venue. These cameras monitor and record activity along Bevan Halter Avenue, the race day stalls and the swab facility. In certain circumstances we will retain surveillance footage, which may include images and video recordings of you.

We note that Personal Information may also be collected through the various documentation and procedures necessary to facilitate the housing of horses and the participation in the sport of racing, such as a record of all executed Stable Agreements.

Collecting Sensitive Information

Sensitive Information is defined in the Privacy Act 1988 as information or opinions about such things as an individual's racial or ethnic origins, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Under the legislation, Sensitive Information will be used by us only:

- For the primary purpose for which it was obtained;
- For a secondary purpose that is directly related to the primary purpose; and
- With your consent; or where required or authorised by law.

We believe that there is a possibility that, from time to time, the optical surveillance devices may collect certain sensitive information about a particular person.

Indirect Collection

In the course of handling and resolving a complaint, review or an investigation, we may collect Personal Information (including Sensitive Information) about you indirectly from publicly available sources or from third parties such as:

- Your authorised representative if you have one; and
- Applicants, complainants, respondents to a complaint, investigation, or the third parties' employees and witnesses.

Anonymity

Where possible, we will allow you to interact with us anonymously or using a pseudonym. However, please be advised that in the interests of maintaining the safety and security of all entrants to the Premises, we will need to be able to identify those people who enter into certain restricted areas.

How we hold your Personal Information

Your personal information is securely stored in our on-site database and on a secure internal server in accordance with the Optical Surveillance Devices Policy. Only certain authorised staff (the Stewards) can access your personal information and these staff members are required to maintain the confidentiality of your personal information at all times. Direct access to our database or server is restricted to ensure your data remains secured and protected and we use all reasonable means to protect your personal information securely against unauthorised access and disclosure.

For What Purpose do we collect, hold, use and disclose your personal information?

The Purposes for which we collect, hold, use and disclose your personal information depend on how and why that information was originally gathered by use from you. We will not

collect, hold, use or disclose your personal information other than for the purpose for which it was collected, or for a purpose which is reasonably apparent at the time we collect it.

Your personal information may be collected, held, used or disclosed for various purposes including the following:

- Safety and Security of the Venue

The Darwin Turf Club and Thoroughbred Racing NT are committed to providing a safe and secure environment for all who attend the race track as participants in the sport of racing. In order to provide that environment and to sustain the sport of racing in the Northern Territory, the Darwin Turf Club and Thoroughbred Racing NT will from time to time collect, hold, use and disclose your Personal Information in order to identify you in the provision of services of the Racetrack.

- Animal Welfare

Personal Information will be collected to ensure that all horses that enter the Premises as participants in the sport of racing are treated fairly and with respect. Information will be disclosed to a relevant authority in the event of any mistreatment of an animal or procedure done to an animal that breaches the Rules of Racing.

- Integrity of the Sport

The TRNT Stewards supervise the conduct of race meetings and racehorse training activities and investigate incidents of breach under the Rules of Racing. Their job is to maintain the integrity of the sport of racing through the enforcement of those Rules.

- Personal information will be disclosed to the Stewards to review any allegations or evidence of a breach of the Rules of Racing, Track Regulations, Stable Agreement or any other terms of entry to the stables area.
- Personal information will also be provided to any relevant authority in the event that a breach of the Rules of Racing also amounts to an offence under applicable Territory or Federal legislation.

- Complaints

- Where a person makes a complaint about an entrant to the Premises or a Participant to the Sport, the footage collected from the surveillance devices will be viewed by the Stewards and, if applicable, may be used by them to investigate or inquire into the complaint or may be disclosed to the relevant regulatory or law enforcement body.

- Law Enforcement and Regulatory Bodies

As a premises that provides gaming services, some of our activities are monitored by law enforcement and regulatory bodies including Licensing NT and the Australian Transaction Reports and Analysis Centre (AUSTRAC). Your personal information may be collected, held and disclosed by us to such organisations as required or authorised by law. Your information may also be disclosed to fraud-checking

agencies and credit reference agencies for the purposes of carrying out verifications and credit checks.

- Service Providers

- The Club and TRNT may from time to time utilise external service providers to whom we disclose personal information. These include providers that host our website servers, manage our IT System and attend to the installation and maintenance of our technical hardware for the operation of the Surveillance Devices.

To protect the personal information we disclose we:

- Enter into a contract or MOU which requires the service provider to only use or disclose the information for the purposes of the contract or MOU;
- Include special privacy requirements in the contract or MOU, where necessary.

- Disclosure Overseas

Generally there will be no disclosure of information overseas except in a situation where disclosure is required for an ongoing investigation, criminal proceedings or a complaint made against a guest or visitor to the Premises.

We take all reasonable steps to ensure that any overseas recipients do not breach any of the obligations imposed under the Australian Privacy Principles in relation to any Personal Information we may disclose to them.

Quality of Personal Information

To ensure that the personal information we collect is accurate, up-to-date and complete, we:

- Record information in a consistent format;
- Where necessary, confirm the accuracy of information we collect from a third party or a public source;
- Promptly add updated or new personal information to existing records;
- Regularly audit our contact lists to check their accuracy

We also review the quality of personal information before we use or disclose it.

Storage and Security of Personal Information

We take steps to protect the security of the personal information we hold from both internal and external threats by:

- Regularly assessing the risk of misuse, interference, loss, and unauthorised access, modification or disclosure of that information;

- Taking measures to address those risks, for example, we keep a record (audit trail) of when someone has added, changed or deleted personal information held in our electronic databases and regularly check that staff only access those records when they need to;
- Conducting regular internal and external audits to assess whether we have adequately complied with or implemented these measures.

For further information on the way we manage security risks in relation to personal information we hold please refer to the Optical Surveillance Devices Policy.

We destroy personal information in a secure manner when we no longer need it.

Accessing and Correcting your Personal Information

Under the Privacy Act 1988 you have the right to ask for access to personal information that we hold about you, and ask that we correct personal information. You can ask for access or correction by contacting us and we must respond within 30 days. If you ask, we must give you access to the information collected or provide a response in writing as to why we are prevented from allowing you access.

If any information collected is incorrect we must take reasonable steps to correct it, unless there is a law that allows or requires us not to.

We will ask you to verify your identity before we give you access to your information or correct it, and we will try to make the process as simple as possible. If we refuse to give you access to, or correct, your personal information, we must notify you in writing setting out the reasons.

If we make a correction and we have disclosed the incorrect information to others, you can ask us to tell them about the correction. We must do so unless there is a valid reason not to.

If we refuse to correct your personal information, you can ask us to associate with it (for example, attach or link) a statement that you believe the information is incorrect and why.

Please make a request to access personal information in writing. We will not charge any fee for your access request, but may charge an administrative fee for allowing you to access the information, under supervision of an authorised staff member.

How to make a Complaint

If you wish to complain to us about how we have handled your personal information you should complain in writing.

If we receive a complaint from you about how we have handled your personal information we will determine what (if any) action we should take to resolve the complaint.

If we decide that a complaint should be investigated further, the complaint will usually be handled by a more senior officer than the officer whose actions you are complaining about.

You will receive confirmation of our receipt of your complaint and we will respond to it with a decision within 30 days.

How to Contact us

You can contact us by:

Attention: Andrew O'Toole, CEO Thoroughbred Racing Northern Territory

Email: trnt@trnt.org.au

Telephone: 08 8923 4222

Post: GPO Box 589 Darwin NT 0801

Fax: 08 8923 4233

Supplementary Materials

- Australian Privacy Principles
- Optical Surveillance Devices Policy
- Darwin Turf Club Track Regulations