



**STG 4T (Aust) Pty Ltd**

**(ABN: 91 622 279 056)**

Suite 405 Level 4, 66 Smith Street, Darwin City, NT, 0800, Australia

[www.4dLotto.com.au](http://www.4dLotto.com.au)

## **Privacy Policy**

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## **1. Purpose and Scope**

The purpose of this Privacy Policy (**Privacy Policy**) is to provide an understanding of how STG 4D (Aust) Pty Ltd (**4D, we and us**) utilise the information and data you provide to us as a result of your interactions with 4D, your use of our website or whenever we otherwise deal with you. We are committed to ensuring that the information we collect about you is protected and is used, stored and disclosed in accordance with the *Privacy Act 1988* (Cth), and its associated guidelines known as the Australian Privacy Principles (**APP**) and any other applicable law.

We take your privacy seriously and acknowledge the importance of privacy and customer data security, not only just because the Australian law says we must, but because we believe it to be the right thing to do.

The scope of this Privacy Policy applies to the collection of your information and the what, where, and why aspects of its collection and use. It also provides assistance with how to interact with the personal information you provide to us, how to contact us with relation to your personal information, how to make a complaint in relation to your personal information and an overview of your rights and choices in relation to your personal information.

If you do not agree with the terms of this Privacy Policy, please do not use our website, services or otherwise provide us with your personal information.

This Privacy Policy will not apply to third-party websites or apps which are linked to 4D's website and over which we have no control. We strongly recommend reviewing the relevant third-party privacy policy before using any linked website or app.

## **2. Collection of your Personal Information**

### **2.1 What information we collect and hold and how we use it**

We do collect and store your information in the normal course of running our lottery business. The kinds of personal information that we collect from you depend on the nature of your dealings with us. The information and data we may collect, use and process includes the following:

- a) information that you provide to us by filling in forms on the website or any other information you submit to us via the website or email or other means including name, residential address, date of birth, gender, email address, phone number(s), personally submitted preferences, bank account and credit card information, or other financial information;
- b) records of correspondence, whether via the website, email, telephone or other means;
- c) your responses to surveys or customer research that we carry out;
- d) personally submitted preferences and service usage information;
- e) details of the transactions you carry out with us, whether via the website, telephone or other means;

- f) details of your visits to the website including, but not limited to traffic data, location data, IP address, weblogs and other communication data;
- g) betting activities and behavioural data when interacting with the website;
- h) identity verification information; and
- i) recording of all telephone calls and website activity.

You must only provide accurate information that you are authorised to disclose in order to allow us to use your personal information in accordance with this Privacy Policy.

We will ordinarily collect your personal information directly from you, primarily through your use of the website or over the telephone. We may also collect personal information from others, for example our agents or affiliates whom we engage to undertake marketing activities.

We are required by law to collect some personal information about people who use our services. We are required to collect certain information (including identity verification information) under the *Anti-Money Laundering and Counter Terrorism Act 2006* (Cth).

In order to verify the personal information, you provide us we may use a verification service which involves a request to have the information you provide matched against official records and may involve use of secure third party systems and services.

We may also collect personal information from job applicants, our employees and individuals associated with our business partners and service providers. Usually, this information is limited to name and contact details and the other information we need for the purpose of processing a job application and managing our business relationships.

We may also collect your personal information in line with any proposed or actual sale of any 4D business or purchase of an interest in another business, including any related transition, separation and collaborative arrangements (**Corporate Transactions**).

## 2.2 What is Click Data and Cookies?

We collect data about you in the use of our website and what your preferences may be. This enables us to recognise you as a repeat customer. In better recognising you and your online preferences, we can provide you a more user friendly and tailored experience with us online that is less key stroke intensive.

A key mechanism for us to track your preferences is by using “cookies”. The Office of the Australian Information Commissioner defines cookies as being “...a small data file stored on your device’s browser. Its purpose is to help a website keep track of your visits and activity.” (**Cookies**) Using Cookies, we are able to create more relevant promotions for you, and in turn, use Cookies to test our e-mail tools are working and to keep web based

administrative statistics. More information on how and why we use Click Data and Cookies, and your option relating to Click Data and Cookies, can be found in this policy below.

Cookies are commonly capable of being blocked by you, but this depends on your personal computer settings and the browser you are using. Keep in mind that if you do reject cookies, it may have a negative impact on your user experience with us and limit all the interactive features our website uses.

Finally, some Click Data we use may be non-identified data. This means that we cannot necessarily identify the identity of the source of the data and includes: the pages you browse through; websites that directed you to us; keywords you used to find us in search engines; your IP address; Cookies (please see Cookies section above).

You may wish to read further on Cookies and targeted advertising. We encourage you to do so at the OAIC website at the following link: [OAIC Privacy, advertising and Cookies](#).

### *2.3 Why do we collect and hold your Personal Information?*

We collect, store and use (and at times disclose) your personal information to provide you with products and services and to manage our business, which includes the following reasons:

- to meet our legal requirements under Australian law, the requirements of our regulators, and the requirements in relation to our AML/CTF obligations;
- to ensure you are of a legal age to purchase entries into lotteries in Australia (18+);
- to confirm the currency you hold in your account with us and other information like your encrypted password, payment details, banking and card details;
- to verify your identity and assist fraud detection;
- internal monitoring and to provide insights that help us understand the impact of our products, services and experiences have on our customers more broadly;
- to administer our responsible gambling programs (for more information please see our Responsible Gambling Policy);
- to protect the safety and security of our people, sites and assets;
- to protect and defend our legal rights and interests;
- to facilitate Corporate Transactions;
- to undertake analytics activities that inform our product development initiatives and marketing campaigns;
- to manage, administer and improve the quality of our products and services;
- other administrative and operational tasks like account management, systems development and testing, risk management, investigation of unlawful activity, staff

training, maintaining our records, market and customer satisfaction research or collecting debts; and

for other reasons where the law, the conditions of our licence and relevant rules may require us or allow us to use your Personal Information.

We will only disclose personal information to business partners, successors in title to our business and suppliers that are engaged to process such information on our behalf for the following purposes:

- to the extent necessary, to provide the service you have requested or to meet the purpose for which your personal information was submitted;
- to service providers and professional advisers for the purposes of providing services to us (e.g., auditors, lawyers, IT consultants, third parties) who might assist us to comply with identity verification and background check obligations or other professional requirements;
- to our sponsors and business partners strictly for the purposes of our business relationship with them;
- to actual or prospective purchasers of all or a part of our business, and their advisers;
- if we have informed you of the particular third party to whom your personal information will be disclosed, at the time of collection;
- in order to participate in activities with business partners, who will be identified to you when the relevant personal information is collected;
- to check your age and identity;
- for fraud and money laundering prevention and for other lawful purposes associated with the conduct of our business;
- where requested from a government affiliated health department or similar department for the purpose of studies, such as identifying gambling trends and harm minimisation, with this information being strictly deidentified;
- if the disclosure is:
  - (a) permitted by law;
  - (b) permitted by the Australian Privacy Principles;
  - (c) necessary to co-operate with the judicial process of a law enforcement agency;
  - (d) necessary to protect and defend the rights or property of 4D or this website;

- (e) necessary to lessen, prevent or detect unlawful activity or serious threats to individuals, public health or safety; or
- (f) to establish or defend a legal claim.

We will take reasonable steps to ensure that any personal information we disclose to a third party is protected by that party in accordance with the Privacy Act.

We are entitled to share the information we hold on you, which includes personal data and betting history, with statutory authorities, and other bodies, including the police, in order to investigate fraud, money laundering or sports integrity issues (including, without limitation, any betting activity we consider to be unusual or suspicious) and to comply with our legal and regulatory obligations.

We will only retain your information after you membership ends consistently with all legal and regulatory requirements and this Privacy Policy.

#### *2.4 Direct Marketing*

We may use your personal information to send you information and advertisements about our products and services we think you'd be interested in. Generally, we'll only use your personal information to tell you about the products and services that you've expressed an interest in using. Sometimes, we'll also use your personal information to tell you about our products and services. We tell you about these things by various methods including email, SMS text messages and push notifications. There is more detail on how we do this, and how you can opt-out, below.

#### *2.5 Targeted Online Advertising*

As mentioned above, we use your personal information to market our products and services to you – and to show you advertisements. We use digital platforms like social media and Google. We may use marketing agencies and software services to help us deliver that advertising, and to tell you about our products and services that may be of interest to you based on your interactions with us.

These third-party companies may use Personal Information that they already hold, or information we may provide to them (including through your Cookies and Click Data), to serve you with more relevant advertising about our products and services. They do not use your personal information from us for their own purposes, and they do not share your personal information with anyone else.

Our marketing agencies may contact you directly on our behalf if directed by us for us to gain a greater insight into how we can develop products and services that are more relevant to you, for instance, in order to conduct market research. You can hide or block most targeted advertising by following the prompts in that advertising (e.g., opt out link). If you hide or block it, or otherwise opt-out of direct marketing, you won't get any online advertising based on

the Personal Information we hold and disclose. However, you may still see similar advertisements based on your anonymous browsing history and untargeted advertisements.

## **2.6**      *Personalising your visit to our website*

If you use our website, we may show you personalised offers and content. We can do this using your unique customer account ID and by using Cookies and Click Data. We use this to do things like assign you to the right jurisdiction for your location, altering website navigation based on your most visited pages, or displaying results, etc. from your previous browsing or purchasing.

From time to time, we may also use Cookies from third party websites (for example, those that display our advertising) to personalise your online experience with us. Cookies are commonly capable of being blocked by you, but this depends on your personal computer settings and the browser you are using. Usually this can be done via your internet browser settings or deleting Cookies from within your browser's cache. Keep in mind that if you do reject cookies, it may have a negative impact on your user experience with us and limit all the interactive features our Website uses.

## **2.7**      *Analytics*

We also generate aggregated and personalised insights about our business and brand from the Personal Information we hold. These insights help us to identify trends and patterns that mean we're creating the right products and services for our customers. This information also drives our marketing campaigns and helps us assess how effective they are.

## **2.8**      *Opting out of Direct Marketing*

You can opt-out of receiving direct marketing or targeted advertising communications at any time. You'll find the specific instructions through each marketing piece or in your account settings under 'Communication preferences'. If you cannot find how to opt-out, please contact us via email on support@4dlotto.com.au and we can manually record your marketing preference.

# **3.      *How we may disclose and share your personal information***

## **3.1**      *Third parties*

Once we have your Personal Information we may disclose or share your personal information, for example:

- in order to enforce or apply the terms of this Privacy Policy, the Terms & Conditions, or any other agreements
- our employees, contractors, and service providers in order for them to do their job and provide their services



- any regulator, be that State, Territory or Commonwealth jurisdiction and their related authorities and agencies, where they have a valid legal obligation or right to access that information
- to any of our related companies or entities, so that they may comply with their obligations at law, licence conditions and game rules and can market directly to you
- to companies or bodies that will verify identity or assist with any obligation of due diligence pursuant to the AML/CTF laws - by using our Website you agree to this Privacy Policy and you consent for us to share relevant Personal Information with chosen credit reporting bodies or the equivalent
- any business, company or entity that we partner with or third parties used to facilitate a loyalty or affiliate program
- for market research or training purposes
- in the necessary protection of any person, property or legal right
- for marketing and promotional purposes which includes any medium such as postal mail, sms, mms, phone call or otherwise. This may include our authorised and/or related third party partners to provide you product and service information directly. You consent to any such marketing activity unless and until you opt out of it
- where we sell or buy any business and we may disclose your personal data to the prospective seller or buyer of such a business or its assets
- where you have consented for us to

### 3.2 *Disclosure and Sharing of Your Personal Information overseas*

We may choose to share or disclose your personal information overseas for the following reasons:

- for cloud data storage purposes;
- IT support that may be based in another country or jurisdiction;
- fraud and identification checks; and
- other international firms that we may reasonably choose to use from time to time and for the principal purpose of activities related to our business.

If we do transfer your information overseas, we will take all reasonable steps to ensure that it is treated as securely as it is within Australia (i.e., in accordance with the APPs), or ensure that the transfer of your information is in accordance with the applicable laws. We implement corporate rules, model contracts and privacy shields (where available) to accomplish this.

## **4. *Responsible Gambling***

We are committed to delivering our products and services responsibly by supporting a well-regulated and responsible gambling industry, characterised by integrity at all levels.

Sometimes, we'll collect your sensitive information (for example, your health information) to administer our responsible gambling programs. Please know that if we do this, it's only for that purpose. We may also monitor transactions on your accounts, emails you send us and information you provide us during telephone calls – this is to support you and help you make informed choices in line with our responsible gambling programs.

If we collect your personal information in connection with a responsible gambling program (excluding health or other sensitive information), we use it for internal monitoring and to provide insights that help us understand the impact our products, services and experiences have on our customers more broadly.

You can read more about our responsible gambling programs by visiting [www.4dlotto.com.au/responsiblegambling](http://www.4dlotto.com.au/responsiblegambling).

## **5. Your rights and choices**

### **5.1 Website options**

First and foremost, your use of our website is optional. You may choose to navigate away, or not use the site if you do not agree with this Privacy Policy.

As mentioned above, you may also limit Cookies by setting your browser to not accept those Cookies.

### **5.2 Personal Information rights and choices**

If you wish to update your personal information with us as you believe it to be incorrect you may contact us on 1300 056 886. Please note that you may be able to update some of your information via the 'My Account' page on our website.

You may also request a copy of your personal information record by the following process;

1. we will provide you with a form to complete;
2. we will also require valid proof of your identity to provide with your form; and
3. after we have had a reasonable time to process the form, and your verification of identity, we will respond within a reasonable time (usually thirty (30) days)

We acknowledge that we cannot require you to complete the form, however we request you do so to make your request easier to process. Further, we reserve our right to reject an unreasonable request for personal information in circumstances where the form of the request would be unreasonably arduous or otherwise unreasonable.

Personal information requests may be made by e-mail at support@4dlotto.com.au.

## **6. How you can make a complaint**

### **6.1 Complaint Procedure**

If you're worried about how we have handled your personal information or your privacy, please let us know so we can take steps to address your concerns.

If we do not address your concerns when you first raise it, you can make a written complaint and we'll do our best to resolve it for you. There are two steps available to you with relation to any complaint relating to personal information:

1. **Talk to us:** You may put your complaint in writing and seek to resolve your dispute with us directly. We treat all complaints seriously. Your complaint may be made to the below e-mail addresses or contact methods. Upon receipt, we will investigate the circumstances of your complaint, assess your complaint (aiming to resolve it quickly and efficiently) and respond to you in a reasonable time (usually 30 days); and/or
2. **Contact the Office of the Australian Information Commissioner (OAIC):** If we are unable to resolve your dispute with us, or you are not satisfied with how we managed your complaint, you may wish to contact the OAIC (please see the following link to the OAIC's contact page: <https://www.oaic.gov.au/about-us/contact-us>) or visit their complaint webpage at <https://www.oaic.gov.au/privacy/privacy-complaints/>

## **7. How to contact us**

You may contact us with relation to any personal information issue, question or otherwise at:

- Mail: PO BOX 102, Port Melbourne, VIC, 3207
- Phone: 1300 056 686
- Email: [help@4dlotto.com.au](mailto:help@4dlotto.com.au)

8. Document Control

Revision History

Revision	Date	Section(s)	Description
Release 1.0	1 May 2024		Creation
Release 1.1	14 June 2024	Document Control	Added Document Control