

Ludo Labs's Privacy Policy

Ludo Labs Pty Ltd ABN 72 666 750 876 (Trading as My Club Wins) (**we, us, our**) is a fundraising company bound by the Australia Privacy Principles (**APPs**) in the *Privacy Act 1988* (Cth) (**Privacy Act**). We understand the importance of, and are committed to, protecting your personal information. This Privacy Policy explains how we manage your personal information (that is, information or an opinion about you), whether true or not, which identifies you or from which your identity is reasonably identifiable, including our obligations and your rights in respect of our dealings with personal information collected by us.

Please take a moment to read our Privacy Policy as it describes what happens to the personal information (that is, information or an opinion about you, whether true or not, which identifies you or from which your identity is reasonably identifiable) that is collected via our website at <https://myclubwins.com.au/privacy-policy> (the **Website**).

1. How we collect your personal information

We will collect and hold personal information in a fair and lawful manner, and not in an intrusive way. Where it is reasonably practical to do so, we will collect personal information directly from you. We may collect the personal information you directly give us through some of the following means:

- (a) when you make an inquiry or order in relation to goods or services through our website located at <https://myclubwins.com.au/contact-us>
- (b) in completing forms for our products and or services;
- (c) in administering and performing any contracts with service providers;
- (d) when you contact us via telephone, email or facsimile;
- (e) from correspondence (whether in writing or electronically);
- (f) through any mobile applications provided by our organisation;
- (g) while conducting customer satisfaction and client feedback surveys;
- (h) when providing any of our services to you; and
- (i) as otherwise required to manage our business.

However, in certain cases we may collect personal information from publicly available sources and third parties, such as our suppliers, our partners, or third party providers, government agencies, contractors, our clients, and business partners.

If we collect personal information about you from a third party we will, where appropriate, request that the third party inform you that we are holding such information, advise you how we will use and disclose it, and that you may contact us to gain access to and correct and update the information.

2. Types of personal information we collect

The type of personal information we may collect can include (but is not limited to), your name, postal address, email address, date of birth, phone numbers, billing information, and, if applicable, employment information.

We may also collect and hold sensitive information about you, including:

- (a) your racial or ethnic origin;
- (b) your religious beliefs or affiliations; and
- (c) genetic information.

We only collect sensitive information about you with your consent, or otherwise in accordance with the Privacy Act.

Where you do not wish to provide us with personal information, we may not be able to provide you with requested products and or services.

3. Our purposes for handling your personal information

As a general rule, we only process personal information for purposes that would be considered relevant and reasonable in the circumstances.

We collect, hold, use and disclose personal information to:

- (a) offer and provide you with our services;
- (b) manage and administer those services, including account keeping procedures;
- (c) communicate with you, including (but not limited to), emailing you tax invoices, purchases, results and authorisations;
- (d) comply with our legal and regulatory obligations; and
- (e) otherwise to manage our business.

We will not use or disclose your personal information for any other purpose unless you have consented to that use or disclosure.

We may disclose personal information between our organisations or to third parties such as our suppliers, organisations that provide us with technical and support services, or our professional advisors, where permitted by the Privacy Act. If we disclose information to a third party, we generally require that the third party protect your information to the same extent that we do.

4. Protection of personal information

We will hold personal information as either secure physical records, electronically on our intranet system, in cloud storage, and in some cases, records on third party servers, which may be located overseas.

We maintain appropriate physical, procedural and technical security for our offices and information storage facilities so as to prevent any loss, misuse, unauthorised access, disclosure, or modification of personal information. This also applies to disposal of personal information.

We further protect personal information by restricting access to personal information to only those who need access to the personal information to do their job. Physical, electronic and managerial procedures have been employed to safeguard the security and integrity of your personal information.

We will destroy or de-identify personal information once it is no longer needed for a valid purpose or required to be kept by law.

5. Direct marketing

Like most businesses, marketing is important to our continued success. We believe we have a unique range of products and services that we provide to customers at a high standard. We therefore like to stay in touch with customers and let them know about new opportunities. We may provide you with information about new services and promotions either from us, or from third parties which may be of interest to you.

We will not disclose your personal information to third parties for marketing purposes without your consent.

You may opt out at any time if you no longer wish to receive commercial messages from us. You can make this request by contacting our Privacy Officer.

6. Cookies

A cookie is a small text file stored in your computer's memory or on your hard disk for a pre-defined period of time. We use cookies to identify specific machines in order to collect aggregate information on how visitors are experiencing the Website. This information will help to better adapt the Website to suit personal requirements. While cookies allow a computer to be identified, they do not permit any reference to a specific individual. For information on cookie settings of your internet browser, please refer to your browser's manual.

7. Accessing and correcting your personal information

You may contact our Privacy Officer to request access to the personal information that we hold about you and/or to make corrections to that information, at any time. On the rare occasions when we refuse access, we will provide you with a written notice stating our reasons for refusing access. We may seek to recover from you reasonable costs incurred for providing you with access to any of the personal information about you held by us.

We are not obliged to correct any of your personal information if we do not agree that it requires correction and may refuse to do so. If we refuse a correction request, we will provide you with a written notice stating our reasons for refusing.

We will respond to all requests for access to or correction of personal information within a reasonable time.

8. Overseas transfers of personal information

As at the date of this Privacy Policy, we are not likely to disclose your personal information to overseas recipients.

If in future we do propose to disclose personal information overseas, we will do so in compliance with the requirements of the Privacy Act. We will, where practicable, advise you of the countries in which any overseas recipients are likely to be located.

If you do not want us to disclose your information to overseas recipients, please let us know.

However, from time to time we may engage an overseas recipient to provide services to us, such as cloud-based storage solutions. Please note that the use of overseas service providers to store personal information will not always involve a disclosure of personal information to that overseas provider. However, by providing us with your personal information, you consent to the storage of such information on overseas servers and acknowledge that APP 8.1 will not apply to such disclosures. For the avoidance of doubt, in the event that an overseas recipient breaches the APPs, that entity will not be bound by, and you will not be able seek redress under, the Privacy Act.

9. Resolving personal information concerns

If you have any questions, concerns or complaints about this Privacy Policy, or how we handle your personal information, please contact our Privacy Officer:

The Privacy Officer

P O Box 9070
Moonee Beach, NSW 2450

Telephone: 0433 12 12 13

Email: privacy@myclubwins.com.au

We take all complaints seriously, and will respond to your complaint within a reasonable period.

If you are dissatisfied with the handling of your complaint, you may contact the Office of the Australian Information Commissioner:

Office of the Australian Information Commissioner

GPO Box 5218

Sydney NSW 2001

Telephone: 1300 363 992

Email: enquiries@oaic.gov.au

10. Changes

We reserve the right to change the terms of this Privacy Policy from time to time, without notice to you. An up-to-date copy of our Privacy Policy is available on our Website.

The last update to this document was March 2025.