

# RISE Privacy Policy and Participant Data Collection Notice

## 1. Purpose of This Privacy Policy and Collection Notice

RISE Racing Pty Ltd (RISE) is committed to handling personal information responsibly, transparently, and to taking reasonable steps in the circumstances to comply with applicable Australian privacy laws.

The purpose of this Privacy Policy and Participant Collection Notice is to explain, in clear and practical terms:

- how RISE collects, holds, uses, and discloses personal information;
- the purposes for which participant and industry-related information is collected and managed;
- how personal information is shared and used across Australian State and National harness racing bodies; and
- the steps RISE takes to protect personal information, having regard to its role, operating model, and current technical and organisational capabilities.

This policy is intended to ensure that individuals are properly informed about how their personal information is handled when interacting with RISE-operated systems, platforms, websites, and services, and when participating in the Australian harness racing industry.

RISE operates as a national technology service provider and system operator for the Australian harness racing industry. In this role, RISE develops, delivers, maintains, enhances, and supports industry-wide information technology systems and services on behalf of State and National harness racing bodies. As a result, RISE processes and holds personal information for authorised industry, regulatory, integrity, welfare, financial, and operational purposes that are reasonably necessary.

This Privacy Policy and Collection Notice is designed to reflect RISE's current operating environment, systems, processes, and controls. It does not seek to overstate or guarantee particular technical measures or security outcomes. Instead, it describes the practical steps RISE currently takes, and its ongoing commitment to reviewing and improving privacy and information-handling practices over time, taking into account risk, proportionality, and available resources.

RISE recognises that no information system or control framework is entirely risk-free. Accordingly, this policy is framed around the legal standard of taking reasonable steps in the circumstances to protect personal information, rather than asserting absolute security or infallibility.

This policy also supports consistent, lawful handling of personal information across all State and National harness racing bodies that rely on RISE-operated systems, while respecting the statutory roles and responsibilities of individual State and National controlling bodies.

## 2. Scope and Application

This Privacy Policy and Participant Collection Notice applies to RISE Racing Pty Ltd and governs the handling of personal information by RISE in connection with the development, delivery, maintenance, enhancement, and support of information technology systems and services for the Australian harness racing industry.

This policy applies to personal information collected, held, used, or disclosed by RISE through:

- RISE-operated systems, platforms, and applications (including industry administration and racing systems);
- RISE-operated websites and digital services;
- interfaces, APIs, data feeds, and integrations between RISE systems and State or National jurisdiction systems, national bodies, and other authorised industry participants or customers;
- operational, technical, and support activities undertaken by RISE on behalf of the harness racing industry.

This policy applies regardless of whether personal information is collected directly from individuals, indirectly through industry systems, or provided to RISE by State or National harness racing bodies in the course of industry administration.

#### Jurisdictional Context

RISE operates within a federated industry model. While RISE manages and operates shared industry systems, State and National harness racing bodies retain their own statutory responsibilities and decision-making authority in relation to participant administration, licensing, integrity, welfare, and regulatory functions.

Accordingly:

- This policy describes how RISE handles personal information within RISE's control or operational responsibility.
- It does not replace, override, or limit the privacy policies, notices, or statutory obligations of individual State or National controlling bodies.
- Where personal information is accessed, stored, or used within systems controlled by a State or National body, that body's own privacy framework and governance arrangements apply.

#### Systems and Environments

This policy applies to personal information handled by RISE across:

- production systems used for live industry operations; and
- non-production environments (such as development, testing, training, or analytics), noting that different controls and data-handling practices may apply depending on the environment and purpose.

#### Individuals Covered

This policy applies to personal information relating to:

- participants in the Australian harness racing industry (including licence holders, owners, trainers, drivers, and officials);
- individuals interacting with RISE-operated websites and services;
- other individuals whose personal information is processed within industry systems for authorised purposes.

## Limitations

This policy does not apply to:

- personal information collected and managed solely by third parties outside RISE's operational control; or
- external websites or systems that are not operated or managed by RISE, even where links or integrations exist.

Where RISE engages third-party service providers to support its operations, RISE seeks to ensure that those providers handle personal information in a manner consistent with applicable privacy laws and contractual obligations.

## 3. Legislative and Regulatory Framework

RISE manages personal information in accordance with applicable Australian privacy and data protection laws. The handling of personal information within RISE-operated systems is informed by the legislative frameworks that apply to RISE as a technology service provider, and by the statutory obligations of the State and National harness racing bodies for whom RISE operates industry systems.

The primary legislative frameworks relevant to RISE's activities include:

- the Privacy Act 1988 (Commonwealth) and the Australian Privacy Principles (APPs);
- the Privacy and Data Protection Act 2014 (Vic) and the Information Privacy Principles (IPPs);
- the Victorian Data Sharing Act 2017, where applicable; and
- any other applicable Commonwealth or State legislation governing privacy, data protection, record keeping, and information handling.

These laws require that personal information be collected, used, disclosed, and stored lawfully and fairly, and that organisations take reasonable steps in the circumstances to protect personal information from misuse, interference, loss, and unauthorised access, modification, or disclosure.

### Application of Privacy Obligations

RISE's privacy obligations arise primarily in its capacity as an operator and service provider of industry information systems. In this role:

- RISE implements and maintains processes and controls to support lawful and appropriate handling of personal information within systems it operates or manages.
- RISE does not replace or diminish the statutory privacy obligations of State or National harness racing bodies, which retain responsibility for personal information used in connection with their regulatory, integrity, licensing, welfare, and enforcement functions.
- The application of specific legislative requirements may vary depending on the jurisdiction, system, and purpose for which personal information is being handled.

### Reasonable Steps Standard

RISE's approach to privacy compliance is guided by the legal standard of taking reasonable steps in the circumstances, having regard to factors such as:

- the nature and sensitivity of the personal information involved;

- the purposes for which the information is collected and used;
- the role of RISE as a shared industry service provider;
- the operational environment and systems in use; and
- the resources, scale, and risk profile of the organisation.

This standard recognises that privacy and information security controls must be proportionate and context-specific, and that controls may evolve over time as risks, technologies, and operational requirements change.

#### Interaction with Jurisdictional Frameworks

Where personal information is accessed, stored, or used within systems controlled by State or National harness racing bodies, those bodies' own privacy policies, statutory obligations, and governance frameworks apply in parallel with this policy.

This Privacy Policy and Participant Collection Notice is intended to complement, not override, jurisdiction-specific privacy frameworks, and to support consistent and lawful handling of personal information across the Australian harness racing industry.

#### 4. RISE's Role in the Australian Harness Racing Industry

RISE Racing Pty Ltd operates as a national technology service provider and system operator for the Australian harness racing industry.

RISE provides the development, delivery, maintenance, enhancement, and support of shared information technology systems and services used by State and National harness racing bodies to administer and support the industry. These systems underpin a range of operational, regulatory, integrity, welfare, financial, and industry servicing functions.

RISE performs these activities on behalf of Australian State and National harness racing bodies under contractual and governance arrangements. In doing so, RISE provides a consistent, industry-wide technology platform while recognising that individual State and National harness racing bodies retain their own statutory powers, responsibilities, and decision-making authority.

#### Relationship with State and National Jurisdictions

Within the Australian harness racing industry:

- State and National harness racing bodies are responsible for participant licensing, regulation, integrity oversight, welfare, compliance, and enforcement functions within their respective areas of responsibility.
- RISE supports these functions by operating and supporting shared systems that process and store information required for lawful industry administration.
- Each State and National harness racing body remains responsible for determining how personal information is used within its statutory functions and for complying with its own privacy and data protection obligations.

RISE does not exercise independent regulatory authority over participants and does not determine industry policy outcomes. Its role is to enable State and National harness racing bodies to perform their functions efficiently and consistently through shared technology services.

## Handling of Personal Information

In the course of providing industry systems and services, RISE processes and holds personal information relating to participants and other individuals involved in the harness racing industry.

Depending on the context, RISE may handle personal information:

- as part of operating shared industry platforms used by multiple State and National harness racing bodies;
- under instruction or authority of a particular State or National body; or
- in connection with technical, operational, and support activities necessary to maintain industry systems.

RISE handles personal information in a manner consistent with its role as a service provider and system operator, and in accordance with applicable privacy laws, contractual obligations, and governance arrangements.

## Federated Industry Model

RISE operates within a federated industry model, where responsibility for personal information is shared across multiple entities depending on function, system, and purpose.

This model means that:

- personal information may be accessed, stored, or used by different State and National harness racing bodies through RISE-operated systems for authorised purposes;
- responsibility for privacy compliance may be shared or concurrent, rather than residing with a single entity; and
- RISE's obligations are shaped by its operational role and do not displace the statutory responsibilities of State or National harness racing bodies.

This policy reflects that operating reality and is intended to support lawful, transparent, and consistent handling of personal information across the Australian harness racing industry.

## 5. Functions and Activities of RISE

RISE performs a range of operational, technical, and support functions to enable the effective administration of the Australian harness racing industry through shared information technology systems and services.

These functions are undertaken to support the statutory, regulatory, and operational activities of State and National harness racing bodies, and are delivered in accordance with contractual arrangements and industry governance frameworks. The functions described below are not exhaustive and may evolve over time as systems, services, and industry requirements change.

### Industry Systems and Platform Operations

RISE is responsible for the operation and support of industry-wide technology platforms used by State and National harness racing bodies to manage participant, racing, and administrative information. This includes, but is not limited to, activities such as:

- operating and maintaining core industry systems used for licensing, registration, and participant administration;

- supporting systems that record racing activities, results, ownership, and participation information;
- managing system availability, performance, and operational continuity; and
- providing technical support and incident response for RISE-operated platforms.

#### Regulatory, Integrity and Welfare Support

Through its systems and services, RISE supports jurisdictions in carrying out regulatory, integrity, and welfare-related functions, including, but not limited to:

- enabling access to participant and racing data required for integrity monitoring and compliance activities;
- supporting the administration of licensing, eligibility, and status information;
- facilitating information sharing between State and National harness racing bodies where authorised and appropriate.

RISE does not conduct integrity investigations or make regulatory determinations, but provides the systems that allow State and National harness racing bodies to perform those functions.

#### Financial and Administrative Services

RISE systems support industry financial and administrative processes, including, but not limited to:

- recording and processing participant payments, distributions, and reimbursements;
- supporting interfaces and data exchanges with jurisdictional financial systems;
- enabling reporting and reconciliation activities required for industry administration.

#### Analytics, Reporting and Industry Insights

RISE supports analytics and reporting activities that assist jurisdictions and industry bodies, including but not limited to:

- understand participation trends, performance, and outcomes;
- support operational planning and decision-making;
- meet reporting obligations and information requests.

Where analytics activities are undertaken in non-production environments, RISE applies controls to limit the use of identifiable personal information, as described elsewhere in this policy.

#### Communications and Operational Support

RISE systems may be used to support operational communications with participants and industry stakeholders, including, but not limited to:

- system-generated notifications and alerts;
- communications related to licensing, participation, or industry operations; and
- distribution of information required to support authorised industry activities.

RISE only permits participant information to be used lawful industry and wagering purposes.

## System Development and Maintenance

RISE undertakes system development and maintenance activities to support the ongoing operation and improvement of industry platforms, including, but not limited to:

- system enhancements and configuration changes;
- defect resolution and performance optimisation;
- testing and validation of changes prior to deployment.

These activities may involve access to personal information where necessary for system operation or troubleshooting, subject to applicable controls.

## 6. What Personal Information We Collect

RISE collects and processes personal information that is reasonably necessary to support the administration, regulation, and operation of the Australian harness racing industry through RISE-operated systems and services.

The types of personal information handled by RISE may vary depending on an individual's role within the industry, the systems being used, and the functions being performed by State or National harness racing bodies.

### Participant and Identity Information

RISE systems may process personal information relating to industry participants, including:

- full name and known aliases;
- date of birth;
- participant or licence identifiers;
- gender or other demographic information where required for industry administration;
- jurisdictional registration or licence status.

Participant names and associated racing information may also be published or shared as part of normal industry operations (such as race fields, results, and reporting), in accordance with the purposes for which the information is collected.

### Contact Information

RISE may process contact details, including:

- residential or postal address;
- email address;
- telephone or mobile number.

Contact information is used to support authorised operational, regulatory, and administrative communications.

### Licensing, Registration and Participation Information

RISE systems may contain information relating to an individual's involvement in the harness racing industry, including:

- licensing, registration, and eligibility details;

- ownership, training, driving, or officiating roles;
- racing participation records, nominations, and results;
- compliance or status information relevant to industry participation.

#### Financial and Payment Information

Where required to support industry administration, RISE systems may process:

- payment and reimbursement details;
- transaction records relating to prizemoney or fees;
- limited banking or payment reference information.

Financial information is handled to support authorised financial and administrative functions and is used for lawful industry and wagering purposes.

#### Communications and Correspondence

RISE may process records of communications conducted through or supported by industry systems, including:

- system-generated notifications;
- correspondence related to licensing, participation, or operational matters;
- support or service-related communications.

#### Technical and System Information

RISE systems may collect technical information associated with system use and operation, including:

- user account identifiers and access roles;
- system login and activity logs;
- audit trails and operational logs;
- device, browser, or usage data associated with access to RISE-operated platforms.

This information is used to support system security, performance, auditing, and operational support.

#### Sensitive Information

RISE does not intentionally collect sensitive information (as defined under applicable privacy legislation) unless it is reasonably necessary for authorised industry, regulatory, or welfare-related purposes and is handled in accordance with applicable legal requirements.

#### Data Minimisation

RISE seeks to limit the collection and processing of personal information to what is reasonably necessary for authorised industry purposes. The categories of personal information described above reflect the types of information that may be processed across RISE-operated systems, rather than a guarantee that all such information is collected in every case.

## 7. How Personal Information Is Collected

RISE collects and receives personal information through a range of lawful and authorised channels in the course of operating and supporting information technology systems for the Australian harness racing industry.

Personal information may be collected directly from individuals, indirectly through industry systems, or provided to RISE by State or National harness racing bodies in connection with their statutory and operational functions.

#### Direct Collection from Individuals

RISE may collect personal information directly from individuals when they:

- register, apply, or update details through RISE-operated systems or platforms;
- interact with RISE-operated websites, applications, or online services;
- submit information in connection with licensing, participation, or administrative processes supported by RISE systems;
- communicate with RISE in relation to system support, access, or operational matters.

Direct collection occurs where individuals engage with systems or services operated by RISE as part of industry administration.

#### Collection Through Industry Systems

Personal information may be collected and processed automatically through the use of RISE-operated industry systems, including:

- data entered by authorised users acting on behalf of State or National harness racing bodies;
- information generated as part of racing activities, participation records, or system transactions;
- system logs, audit records, and usage data generated through system operation.

This information is collected to support lawful industry, regulatory, and operational functions.

#### Collection from State and National Jurisdictions

RISE may receive personal information from State or National harness racing bodies where:

- information is required to be stored or processed within RISE-operated systems;
- data is exchanged between jurisdictional systems and shared industry platforms;
- RISE is providing system operation, support, or technical services on behalf of a jurisdiction.

In these circumstances, personal information is provided to RISE under the authority of the relevant jurisdiction and for authorised purposes.

#### Collection from Third Parties

In limited circumstances, personal information may be collected from third parties, including:

- service providers engaged to support RISE systems and operations;
- industry bodies or organisations where information sharing is authorised and appropriate;
- publicly available sources, where relevant to industry administration or integrity purposes.

#### Collection of Technical and Usage Information

When individuals access RISE-operated systems or websites, technical information may be collected automatically, including:

- system access and activity logs;
- device, browser, or session information;
- usage data required for system performance, security monitoring, and auditing.

This information is collected to support the secure and reliable operation of RISE systems.

#### Authority and Consent

Personal information is collected and processed on the basis that it is reasonably necessary for the performance of authorised industry, regulatory, or operational functions.

Where personal information is collected directly from individuals, it is collected under applicable legal authority or in circumstances where collection is reasonably expected as part of participation in the harness racing industry.

As part of participant registration and licensing processes, individuals may also provide express approval for certain personal information to be published or distributed through industry platforms and services, including HarnessWeb, harness.org.au, and authorised API integrations. Where such approval is provided, personal information may be made available through those channels in accordance with the purposes communicated to participants.

RISE does not generally rely on separate consent where personal information is collected, used, or disclosed for lawful primary purposes or directly related secondary purposes within reasonable expectations. Where RISE operates optional services that require consent (for example, optional subscription communications), appropriate consent and opt-out mechanisms will be provided.

#### 8. Purpose of Collection, Use and Disclosure

RISE collects, holds, uses, and discloses personal information for purposes that are reasonably necessary to support the administration, regulation, and operation of the Australian harness racing industry through RISE-operated systems and services.

Personal information is handled to enable State and National harness racing bodies to perform their statutory, regulatory, integrity, welfare, financial, and industry servicing functions in an effective and coordinated manner.

#### Primary Purposes of Collection and Use

The primary purposes for which personal information is collected and used include:

- administration of participant licensing, registration, and eligibility;
- support for racing integrity, compliance, and regulatory oversight;
- welfare and safety management relating to participants and industry activities;
- recording and administration of racing participation, results, and outcomes;
- processing and administration of financial transactions, payments, and reimbursements;
- operation, support, and maintenance of industry information systems;
- operational communications with participants and industry stakeholders;
- reporting, analytics, and industry planning activities.

These purposes reflect the core functions of the Australian harness racing industry and are central to participation in the industry.

#### Use and Disclosure for Related Purposes

In accordance with applicable privacy laws, personal information may also be used or disclosed for secondary purposes that are:

- directly related to the primary purpose of collection; and
- within the reasonable expectations of the individual.

This includes, for example, use or disclosure of information to support:

- cross-jurisdictional administration and oversight;
- integrity monitoring and enforcement activities;
- industry reporting, analytics, and decision-making;
- operational system support, troubleshooting, and maintenance.

This may also include the publication or provision of participant names and publicly relevant racing information (such as race fields and results) where this forms part of normal industry operations. Where participants have provided express approval for publication or distribution of their information through industry systems and platforms, such information may be made available via HarnessWeb, harness.org.au, and authorised API integrations in accordance with those approvals.

Additional consent is not generally required where such use or disclosure is lawful, proportionate, and within reasonable expectations, subject to applicable legal requirements.

#### Disclosure to State and National Jurisdictions

Personal information processed within RISE-operated systems may be disclosed to, accessed by, or shared with State and National harness racing bodies for authorised purposes.

This includes circumstances where State and National harness racing bodies:

- access shared industry systems operated by RISE;
- store or use participant information within their own systems;
- exchange information with other State and National harness racing bodies via RISE-operated platforms, APIs, or data feeds.

Such disclosure supports lawful industry administration, is consistent with the purposes for which the information was collected, and where applicable aligns with participant authorisations provided as part of industry registration and participation processes.

#### Disclosure to Service Providers and Third Parties

RISE may disclose personal information to third-party service providers engaged to support RISE systems and operations, such as hosting providers, software vendors, or support partners.

RISE may also provide controlled access to personal information via APIs, data feeds, or system integrations to authorised State and National harness racing bodies, national industry bodies, and contracted industry participants or customers (including wagering operators), where this is reasonably necessary for lawful industry, regulatory, operational, or wagering purposes.

Where such disclosure or access occurs, it is limited to what is reasonably necessary for the relevant purpose, and RISE seeks to ensure that recipients handle personal information in a manner consistent with applicable privacy obligations, contractual requirements, and their own legal and regulatory obligations.

#### Legal and Regulatory Disclosure

RISE may use or disclose personal information where required or authorised by law, including in response to lawful requests from courts, regulators, law enforcement agencies, or integrity bodies.

#### No Unrelated Commercial Use

RISE does not use personal information for unrelated commercial purposes and does not sell personal information.

The provision of racing and participant information to authorised industry participants (including wagering operators) for lawful industry and wagering purposes is not considered an unrelated commercial use.

### 9. Data Sharing Across Jurisdictions

The Australian harness racing industry operates within a federated model involving multiple State and National harness racing bodies. Effective industry administration requires the lawful sharing and use of participant and industry information across State and National harness racing bodies.

RISE-operated systems are designed to support this model by enabling authorised access to, and sharing of, personal information where required for legitimate industry purposes. This includes participant names and racing-related information that is published or shared as part of normal industry operations.

#### Purpose of Cross-Jurisdictional Data Sharing

Personal information may be shared across State and National harness racing bodies to support:

- participant licensing, registration, and eligibility across multiple jurisdictions;
- integrity, compliance, and regulatory oversight activities;
- welfare and safety monitoring;
- financial administration, payments, and reconciliations;
- industry reporting, analytics, and planning;
- operational coordination between jurisdictions;
- the publication and sharing of participant names and racing-related information as part of normal industry operations.

These activities are central to the functioning of the national harness racing industry and are consistent with the purposes for which personal information is collected, including the publication and sharing of participant names and racing-related information as part of normal industry operations.

#### Role of RISE in Data Sharing

RISE facilitates cross-State and National data sharing by:

- operating shared industry platforms accessed by multiple State and National harness racing bodies;
- supporting controlled access to participant and industry information by authorised users;
- enabling data exchange, APIs, data feeds, and integrations between RISE-operated systems and systems managed by State and National harness racing bodies or authorised industry participants;
- supporting the controlled publication and distribution of participant names and racing-related information through industry systems and platforms.

RISE does not independently determine how State and National harness racing bodies use personal information within their statutory functions. Decisions regarding access, use, and disclosure of personal information for regulatory and enforcement purposes remain the responsibility of the relevant State or National harness racing body.

#### Storage and Use Within Jurisdiction-Managed Systems

State and National harness racing bodies may store or use participant information obtained through RISE-operated systems within their own internal systems (such as financial, analytics, or administrative systems), where this is required for their statutory or operational functions.

Such storage and use is undertaken under the authority and governance of the relevant jurisdiction and in accordance with its applicable privacy and data protection obligations.

#### Access Controls and Authorisation

Access to personal information across State and National harness racing bodies is managed through role-based access controls and system permissions within RISE-operated platforms.

Access is intended to be limited to authorised users performing legitimate industry, regulatory, or operational functions.

#### Transparency and Consistency

This Privacy Policy and Participant Collection Notice is intended to provide transparency regarding the existence and purpose of cross-jurisdictional data sharing within the harness racing industry.

It supports consistent handling of personal information across State and National harness racing bodies, while recognising that individual State and National bodies may have additional policies or requirements that apply within their own systems and governance frameworks.

## 10. Test, Development and Analytics Environments

RISE operates a range of non-production environments to support the development, testing, maintenance, and analysis of industry systems. These environments may include development, test, training, staging, and analytics platforms.

RISE recognises that the handling of personal information in non-production environments presents different risks to those associated with live operational systems and applies controls appropriate to the purpose and context of each environment.

#### Use of Personal Information in Non-Production Environments

As a general principle, RISE seeks to minimise the use of identifiable personal information in non-production environments.

Where practicable and appropriate, RISE generally:

- personal information used in test, development, or analytics environments is de-identified, masked, or obfuscated; and
- datasets are configured to reduce the risk of re-identification.

These practices support lawful analytics and system testing while limiting privacy risk.

#### Authorised Use of Identifiable Information

In limited circumstances, identifiable personal information may be used in non-production environments where:

- it is reasonably necessary to support system operation, testing, troubleshooting, or analytics;
- the use is authorised and aligned with legitimate industry or operational purposes; and
- appropriate access controls and safeguards are applied.

Such use is subject to appropriate governance and controls and is not intended to replicate full production datasets unless required and authorised.

#### Analytics Activities

RISE supports analytics and reporting activities that assist jurisdictions and industry bodies to meet operational, regulatory, and planning requirements.

Analytics activities may involve the aggregation or analysis of participant and industry data. Where analytics are conducted outside production environments, RISE applies controls designed to limit the use of identifiable information and manage re-identification risk.

#### Jurisdiction-Controlled Environments

Where personal information obtained through RISE-operated systems is stored or used within test, development, or analytics environments controlled by State or National harness racing bodies, those environments are governed by the privacy frameworks, controls, and governance arrangements of the relevant jurisdiction.

RISE does not control or manage privacy compliance within jurisdiction-operated systems, but may provide guidance or assistance where requested.

#### Ongoing Review

RISE periodically reviews data handling practices in non-production environments as part of its broader system management and risk assessment activities, recognising that controls and practices may evolve over time in response to operational needs and risk considerations.

Where personal information is used in non-production environments, RISE seeks to ensure that retention is limited to what is reasonably necessary for testing, development, or analytical purposes and does not result in unnecessary long-term storage of identifiable information.

## 11. Data Security and Safeguards

RISE takes the protection of personal information seriously and implements reasonable administrative, technical, and organisational safeguards to protect personal information from misuse, interference, loss, and unauthorised access, modification, or disclosure.

RISE's approach to data security recognises that the nature of the information handled, the role of RISE as a shared industry service provider, and the operational environment in which systems operate require controls that are proportionate to risk and practicable in the circumstances.

### Security Controls and Practices

RISE applies a combination of controls to support the security of personal information within systems it operates or manages. These controls may include, depending on the system and context:

- role-based access controls to limit access to authorised users;
- authentication mechanisms, including multi-factor authentication for higher-risk systems or accounts;
- monitoring, logging, and audit mechanisms to support system oversight and incident detection;
- segregation between production and non-production environments;
- processes to manage user access, account lifecycle, and privilege review;
- technical and procedural controls to support system availability and integrity.

These controls are implemented to support the secure and reliable operation of industry systems rather than to provide absolute guarantees of security.

### Information Security Programme

Following a cybersecurity incident in 2025, RISE has established a structured cybersecurity improvement programme aimed at strengthening governance, controls, and monitoring across its systems.

This programme includes initiatives relating to identity and access management, endpoint protection, monitoring and alerting, incident response, and security awareness. Controls and practices are being reviewed and enhanced progressively, recognising that security uplift is an ongoing process.

### Limitations and Risk Acknowledgement

RISE acknowledges that no information system, network, or control framework is completely secure. While reasonable steps are taken to protect personal information, RISE cannot guarantee that unauthorised access, loss, or misuse will never occur.

Security controls may vary across systems, environments, and over time, and may evolve in response to changes in risk, technology, and operational requirements.

### Responsibility Boundaries

RISE's security responsibilities apply to systems and environments operated or managed by RISE. Where personal information is stored or used within systems controlled by State or National harness racing bodies or third-party service providers, security is governed by the controls, policies, and governance arrangements of those entities.

RISE may provide guidance or support to State and National harness racing bodies or service providers where appropriate, but does not assume responsibility for security controls outside its operational control.

## 12. Data Retention and Disposal

RISE retains personal information only for as long as it is reasonably required to support authorised industry, regulatory, operational, and legal purposes.

In the case of former or inactive participants, certain personal information (such as names and historical participation records) may be retained on a long-term or permanent basis where required to preserve the integrity of historical racing records, reporting accuracy, auditability, and regulatory compliance.

The period for which personal information is retained may vary depending on the nature of the information, the system in which it is held, and the purpose for which it is used.

### Retention Principles

In managing personal information, RISE applies the following principles:

- personal information is retained where necessary to support industry administration, regulatory compliance, integrity, welfare, financial processing, system operation, or reporting;
- retention periods take into account applicable legal, regulatory, audit, and record-keeping requirements;
- information may be retained to support dispute resolution, investigations, or compliance activities where required or authorised;
- certain personal information (such as participant names and historical participation records) may be retained on a long-term or permanent basis where required to preserve the integrity of historical racing records, reporting accuracy, auditability, and regulatory compliance.

RISE does not retain personal information for longer than is reasonably necessary for these purposes, noting that long-term or permanent retention may be reasonably necessary in the circumstances described above.

### Jurisdictional Retention Requirements

State and National harness racing bodies may be subject to specific statutory or regulatory record-keeping obligations that require information to be retained for defined periods.

Where personal information is retained or used within systems controlled by a State or National harness racing body, retention and disposal are governed by that body's own legal and policy requirements, including requirements to retain historical participant and racing records for extended or indefinite periods where necessary.

RISE retains information within shared industry systems in a manner that supports these jurisdictional obligations.

### Disposal and De-Identification

Where personal information held by RISE is no longer required for authorised purposes and is not subject to ongoing legal or regulatory retention requirements, RISE takes reasonable steps to:

- securely delete the information; or
- de-identify the information so that individuals are no longer reasonably identifiable.

This does not apply to personal information that is required to be retained for historical, reporting, audit, or regulatory purposes, including participant names and racing-related records forming part of the official industry record.

Disposal or de-identification methods may vary depending on the system, data type, and operational context.

#### System Backups and Archives

Personal information may continue to exist in system backups, logs, or archival records for a period of time as part of standard operational, resilience, or recovery processes.

Such information is subject to appropriate access controls and is not actively used except where necessary for system restoration, audit, or compliance purposes.

### 13. Cross-Border Processing and Disclosure

RISE's primary operations and industry systems are based in Australia. Personal information handled within RISE-operated systems is generally stored and processed within Australia.

However, in the course of operating and supporting industry systems, RISE may engage third-party service providers or vendors whose services involve limited processing, access, or support activities that occur outside Australia.

#### Overseas Processing

Where personal information is processed outside Australia, this may occur in connection with:

- cloud-based infrastructure or software services;
- vendor support, maintenance, or troubleshooting activities;
- security monitoring, incident response, or specialist technical services.

In such cases, cross-border processing is undertaken only where reasonably necessary to support RISE's operations and industry services.

#### Safeguards for Cross-Border Disclosure

Where RISE discloses or allows access to personal information outside Australia, RISE seeks to take reasonable steps to ensure that the recipient handles personal information in a manner consistent with applicable Australian privacy obligations. This may include:

- contractual arrangements requiring appropriate handling and confidentiality of personal information;
- limiting access to what is reasonably necessary for the service being provided; and
- applying technical or procedural controls to manage access and oversight.

#### Jurisdiction-Controlled Disclosure

Where personal information is disclosed or accessed outside Australia as part of systems or services controlled by a State or National harness racing body, or by authorised industry partners (including wagering operators), cross-border disclosure is governed by the policies, statutory obligations, and governance arrangements of the relevant entity.

### No Unnecessary Offshore Disclosure

RISE does not disclose personal information outside Australia for unrelated commercial purposes and seeks to avoid or limit offshore access where it is not reasonably required for operational, technical, or security purposes.

### 14. Direct Marketing and Communications

RISE only uses personal information for lawful industry and wagering purposes.

Personal information processed within RISE-operated systems may be used to support operational, administrative, regulatory, and industry-related communications that are reasonably necessary for participation in the Australian harness racing industry.

#### Industry and Operational Communications

RISE systems may be used to generate or support communications relating to:

- licensing, registration, and eligibility matters;
- racing participation, nominations, results, and industry operations;
- regulatory, integrity, or welfare-related notifications;
- system alerts, notices, or updates relevant to industry participants.

These communications are issued to support authorised industry functions and are not considered direct marketing for the purposes of applicable privacy legislation.

This is distinct from the use of racing and participant information by authorised external industry participants (such as wagering operators), which occurs under separate legal and regulatory frameworks.

#### Marketing Communications

Where communications could reasonably be considered direct marketing (for example, optional newsletters or promotional material relating to RISE-operated platforms or services):

- such communications will be limited in scope; and
- individuals will be provided with a reasonable means to opt out of receiving those communications.

Opting out of marketing communications will not affect the receipt of essential operational, regulatory, or system-related communications.

#### Communications by Jurisdictions

State and National harness racing bodies may use personal information accessed through RISE-operated systems to communicate with participants for their own statutory, regulatory, or operational purposes.

Such communications are governed by the policies and obligations of the relevant jurisdiction.

#### No Sale of Personal Information

RISE does not sell personal information and does not permit personal information to be used for unrelated third-party marketing purposes.

Where RISE provides racing and participant information to authorised wagering operators or industry partners for lawful racing and wagering purposes, the use of such information by those

entities is governed by their own legal and regulatory obligations. RISE does not control or direct how those entities use information once lawfully disclosed in accordance with applicable agreements and legal requirements.

## 15. Access to and Correction of Personal Information

Individuals have the right to request access to personal information held about them and to request correction of inaccurate, incomplete, or out-of-date information, subject to applicable legal requirements.

RISE recognises the importance of ensuring that personal information processed within industry systems is accurate, up to date, and handled transparently.

### Requests for Access

An individual may request access to personal information that RISE holds about them by contacting RISE using the details set out in Section 20 of this policy.

RISE will take reasonable steps to respond to access requests in accordance with applicable privacy laws. Access may be provided in a manner that is appropriate to the nature of the information and the systems involved.

In some circumstances, access may be limited or refused where permitted by law, including where access would:

- have an unreasonable impact on the privacy of other individuals;
- prejudice the conduct of regulatory, integrity, or enforcement activities;
- compromise system security or operational integrity; or
- be otherwise restricted under applicable legislation.

### Requests for Correction

If an individual believes that personal information held within RISE-operated systems is inaccurate, incomplete, or out of date, they may request that the information be corrected.

RISE will take reasonable steps to facilitate correction where appropriate, which may include:

- updating information within RISE-operated systems; or
- referring the request to the relevant State or National harness racing body responsible for maintaining the authoritative record.

### Jurisdictional Records

In many cases, personal information processed by RISE forms part of records maintained under the authority of a State or National harness racing body.

Where this is the case:

- the relevant jurisdiction may be best placed to assess and action requests for access or correction; and
- RISE may refer the individual to the appropriate jurisdiction or assist in coordinating the request.

## No Fee for Requests

RISE does not generally charge a fee for making a request to access or correct personal information; however, in limited circumstances permitted by law, reasonable administrative arrangements or costs may apply depending on the nature and scope of the request.

## 16. Cookies, Website Analytics and Online Services

RISE operates websites, online services, and digital platforms to support the administration and operation of the Australian harness racing industry.

In the course of providing these services, RISE may collect limited information about website and system usage to support functionality, security, and service improvement.

### Cookies and Similar Technologies

RISE-operated websites and online services may use cookies or similar technologies to:

- support essential website functionality;
- remember user preferences or session information;
- enable secure access to restricted areas of a site; and
- assist with system performance and reliability.

Cookies used by RISE do not typically identify individuals directly but may be associated with a user's device or browser.

Users can generally control or disable cookies through their browser settings. Disabling cookies may affect the functionality or availability of certain features of RISE-operated websites or services.

### Website Analytics

RISE may use analytics tools to collect information about how websites and online services are used. This information may include:

- pages visited and content accessed;
- date and time of access;
- browser type, operating system, or device information;
- referring websites or links.

This information is collected in an aggregated or de-identified form where practicable and is used to:

- monitor system performance and availability;
- understand usage patterns and improve services;
- support security monitoring and incident detection.

RISE does not use website analytics for behavioural advertising or to build advertising profiles of individuals.

### Online Services and User Activity

When users interact with RISE-operated online services or platforms, information may be generated or recorded as part of normal system operation, including:

- login and access activity;

- transaction or submission records;
- system audit logs.

This information is collected to support system security, integrity, auditing, and operational support.

#### Third-Party Services

RISE may use third-party service providers to support website hosting, analytics, or online service delivery. Where this occurs, RISE seeks to ensure that such providers handle information in a manner consistent with applicable privacy obligations.

RISE is not responsible for the privacy practices of external websites or services that are not operated or controlled by RISE.

#### 17. Links to External Websites

RISE-operated websites, systems, and online services may contain links to external websites or services that are operated by third parties, including State or National harness racing bodies, industry organisations, or other external providers.

These links are provided for convenience and informational purposes only.

RISE does not control and is not responsible for the content, security, or privacy practices of external websites or services that are not operated or managed by RISE. The privacy policies and information-handling practices of those external websites apply when individuals access them.

Individuals are encouraged to review the privacy policies of any external websites they visit before providing personal information.

The inclusion of a link to an external website does not constitute an endorsement or approval of that website or its practices by RISE.

#### 18. Complaints and Privacy Enquiries

RISE is committed to responding to privacy enquiries and complaints in a fair, timely, and transparent manner.

Individuals who have questions, concerns, or complaints about how personal information is handled by RISE are encouraged to contact RISE in the first instance.

#### Privacy Enquiries

Individuals may contact RISE to:

- seek information about how personal information is collected, used, or disclosed;
- request clarification regarding this Privacy Policy and Participant Collection Notice; or
- raise general privacy-related enquiries.

RISE will take reasonable steps to respond to enquiries and provide relevant information, having regard to the nature of the enquiry and applicable legal requirements.

#### Privacy Complaints

If an individual believes that RISE has not handled their personal information in accordance with applicable privacy laws or this policy, they may lodge a privacy complaint with RISE.

A privacy complaint should include sufficient detail to allow RISE to understand and assess the concern.

Upon receiving a complaint, RISE will:

- acknowledge receipt of the complaint;
- assess the issues raised;
- take reasonable steps to investigate and respond; and
- where appropriate, take corrective action.

#### Jurisdictional Matters

In some cases, a privacy enquiry or complaint may relate primarily to the actions or decisions of a State or National harness racing body, or to information held within systems controlled by a jurisdiction.

Where this occurs, RISE may:

- refer the matter to the relevant jurisdiction; or
- assist the individual in identifying the appropriate authority to contact.

#### External Review

If an individual is not satisfied with RISE's response to a privacy complaint, they may be entitled to lodge a complaint with the relevant privacy regulator, such as the Office of the Australian Information Commissioner (OAIC) or a State privacy regulator, depending on the circumstances.

RISE encourages individuals to raise concerns directly with RISE first, as this often allows issues to be resolved more efficiently.

### 19. Updates to This Policy

RISE may update this Privacy Policy and Participant Collection Notice from time to time to reflect changes in:

- legal or regulatory requirements;
- industry practices or expectations;
- RISE's systems, services, or operational arrangements; or
- how personal information is collected, used, or managed.

Where material changes are made, RISE will take reasonable steps to make the updated policy available through RISE-operated websites or other appropriate channels.

The most current version of this policy will apply from the date it is published.

Individuals are encouraged to review this policy periodically to remain informed about how personal information is handled.

### 20. Contact Details

For privacy enquiries, requests for access or correction of personal information, or privacy-related complaints, individuals may contact RISE using the details below:

RISE Racing Pty Ltd  
Attention: Privacy Enquiries  
Email: [privacy@riseracing.com](mailto:privacy@riseracing.com)  
Postal Address:  
RISE Racing Pty Ltd  
Level 1, Racing Centre, 400 Epsom Road, Flemington VIC 3031, Australia

RISE will take reasonable steps to respond to enquiries and requests in accordance with applicable privacy laws and this Privacy Policy and Participant Collection Notice.