



Wolf Den's Privacy Policy

This Privacy Policy was last updated on 1st May 2023 and the updates take effect from that date.

1. General:

- a) This is the privacy policy of Wolf Den Services Pty Ltd ACN 655 943 865 ('Wolf Den'). In this privacy policy, a reference to 'National Privacy Principles' means the 'The Australian Privacy Principles' contained in the Privacy Act 1988 (Cth) – details of which can be found here: <https://www.oaic.gov.au/privacy/australian-privacy-principles/read-the-australian-privacy-principles/>
- b) Wolf Den operates an on-line platform for social tips and other social interactions and communication which can be accessed via computers or smart devices using a web browser or app ('Wolf Den Platform').
- c) This privacy policy sets out how Wolf Den will manage your personal information which we collect as result of your account with us and use of the Wolf Den Platform.
- d) By using the Wolf Den Platform you agree to the privacy policy of Wolf Den as set out below. Wolf Den will review this privacy policy periodically and reserves the right to modify parts of this policy at any time and at its discretion. We are committed to ensuring that the personal information we collect about you is protected and is used, stored and disclosed in accordance with the Privacy Act 1988 (Cth) and this Privacy Policy. We recommend you review these pages periodically for any updates.
- e) This privacy policy will not apply to digital assets which are linked to the Wolf Den Platform and over which Wolf Den has no control. We recommend reviewing any relevant third-party privacy policy before using any linked website.

2. Personal Information

- a) For the purposes of this privacy policy, personal information means information or an opinion – including information or an opinion forming part of a database, whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.
- b) The kinds of personal information Wolf Den generally collects from you are:
 - i. name.
 - ii. residential address.
 - iii. date of birth.
 - iv. Gender.
 - v. email address.
 - vi. phone number.
 - vii. personally submitted preferences and service usage information.
 - viii. location data.
 - ix. IP address.
 - x. tipping activities and behavioural data.

3. Collection:

- a) You are welcome to browse our website without ever providing us with your personal information. However, if you wish to open an account with Wolf Den you will be required to



provide us with certain personal information so that we are aware of whom we are communicating with.

- f) We only collect such personal information as is required for the purpose of identifying you, maintaining your account and security reasons. The personal information we collect can be viewed in the Client Identification Requirements section of our Terms and Conditions or the 'My Profile' section of the Wolf Den Platform. By choosing to provide personal information on the Wolf Den Platform, you consent to our collecting and retaining that personal information – Wolf Den will collect personal information in a lawful and fair way, and not in an unreasonably intrusive way.

4. Use and Disclosure:

- a) Wolf Den does not give, sell, rent, share, or trade any personal information regarding our clients to third parties, except as set out below. All Wolf Den employees are subject to confidentiality agreements in respect of client's details and wagering activity.
- b) When we collect personal information on our digital assets, we may use this information to:
- i. process your application to open an account with us.
 - ii. provide you with the services you have requested and/or meet the purpose for which the information was submitted.
 - iii. personalise your experience on our digital assets, or customise our suite of products/services for you.
 - iv. contact you for direct marketing or other promotional purposes.
 - v. create customer segments groups based on demographics and variables to allow for operational efficiencies.
 - vi. determine your liability to Australian GST.
 - vii. respond to legal enquiries and complaints from you and to establish, exercise or defend any legal claims.
 - viii. comply with Wolf Den's legal and statutory obligations including in relation to customer identity verification and reporting obligations imposed by the Anti-Money Laundering and Counter Terrorism Act 2006 (Cth) and any other licensing obligations that apply.
 - ix. take appropriate action if Wolf Den has reason to suspect that unlawful activity or misconduct of a serious nature has been, is being or may be engaged in that relate to our functions and activities.
 - x. assess and process any job applications where you have taken part in our recruitment process.
- c) By choosing to provide personal information on the Wolf Den Platform, you consent to our using your personal information as set out above. Personal information that you submit to our assets may be disclosed to a third party:
- i. to the extent necessary, to provide the service you have requested or to meet the purpose for which it was submitted.
 - ii. if we have informed you of the particular third party to whom it will be disclosed, at the time of collection.
 - iii. in order to participate in activities with business partners and sponsors, who will be identified to you when the relevant personal information is collected.
 - iv. to the extent necessary to carry out the uses which are set out above.
 - v. if the disclosure is required by law, permitted by the National Privacy Principles, necessary to co-operate with a judicial process or a law enforcement agency,



necessary to protect and defend the rights or property of Wolf Den, this site, or participating sites, or necessary to lessen or prevent unlawful activity or serious threats to individuals, public health or safety.

- vi. Betting transactions conducted over the Wolf Den Platform may be observed, recorded and analysed by the relevant controlling body or inspectors from the NSW Office of Liquor, Gaming and Racing.

5. Cookies

- a) Cookies are pieces of data stored by your web browser on your hard drive which contain information relating to your use of the the Wolf Den Platform. When you access the the Wolf Den Platform, cookies may record details relating to your use of the the Wolf Den Platform, including what pages you view on the Wolf Den Platform. Wolf Den does not use cookies to track your personal information and uses them for internal management purposes only.
- b) We may use third parties to serve ads on the Wolf Den Platform. These companies may employ cookies and action tags (also known as single pixel gifs or web beacons) to measure advertising effectiveness. Any information that these third parties collect via cookies and action tags is completely anonymous.



6. Sharing Your Tips

Should you choose to share your tips via the the Wolf Den Platform or any of our Communication Services (as outlined our Terms and Conditions), whether as a default option or on a tip-by-tip basis, all information associated with those bets (excluding stake and payout) is no longer protected by our privacy policy and is considered public information, which includes the following:

- a) The fixture(s) and selection(s) that you have bet on
- b) The odds, including the price and line (if applicable) of the selections(s)
- c) Any marketing products you used associated with the tip.
- d) Any synopsis, reaction or comment you have made against the tip.

7. Marketing and Promotional Preferences

- a) From time to time, we will use the personal information you have provided us to inform you of features, company news and events.
- b) If you wish to opt out from receiving any further promotional material, you can follow unsubscribe instructions on marketing messages, contact our support team via the Wolf Den website, or send an email to [insert email] and we will process your request as soon as is practical.
- c) We will always have the need to contact you regarding the general use of your account. Opting out of promotional marketing materials will not stop you from receiving important non-promotional communications, including messages related to responsible gambling.

8. Data Security:

- a) We will take reasonable steps to protect personal information from misuse, loss, and unauthorised access, modification and disclosure.
- b) You acknowledge that no data transmission over the Internet is totally secure. Accordingly, Wolf Den does not warrant the security of any information which you transmit to it.
- c) Wolf Den's employees, agents and contractors are required to maintain the confidentiality of account holders' personal information and trading behaviour.
- d) Information posted on bulletin boards or communicated within a social media environment (for example, Facebook, Twitter, Chat Rooms including Howl or Race Feed) becomes public information. Wolf Den cannot guarantee the security of this type of disclosed information.
- e) We take seriously the responsibility to exclude children from access to our services. We will not accept their information for the purposes of opening a wagering account. It is however, ultimately the responsibility of parents or guardians to monitor their children's Internet activities including where appropriate by using Internet screening software.
- f) Remember to always log out of your account when you have completed your time on the the Wolf Den Platform. This is particularly important if you share a computer with another person. You are responsible for the security of and access to your own computer, mobile device or any other handset used to access the the Wolf Den Platform.
- g) Ultimately, you are solely responsible for maintaining the secrecy of your username, password and any account information. Please be careful whenever using the the Wolf Den Platform.



9. Non-Personal Information:

Wolf Den may decide to use and/or disclose non-personal information relating to your account usage for general business improvement purposes. For example, disclose website impressions on a particular betting market to current and/or potential stakeholders/partners in Wolf Den to assess whether we increase/decrease our product mix on a particular code. Apart from the mandatory information we need to provide our services to you as set out in our terms and conditions, there may be data that does not personally identify you collected to monitor and improve our service.

10. Access and Correction of Personal Information:

- a) We will take reasonable steps to ensure that the personal information we collect is accurate, complete and up to date.
- b) The personal information collected can be accessed and changed by entering the 'Edit Account Details' in the 'My Profile section after logging on Alternatively, you can contact our support team at support@wolfden.bet from Monday to Friday between the hours of 9am to 5pm AEST.
- c) We will give you access to your personal information in the manner requested if that is possible and within a reasonable period. If we refuse your request, or cannot give you access in the manner you have requested, we will do what we can to meet your requirements by other means.
- d) We may not be required to give you access to your personal information in certain circumstances which are set out in The Australian Privacy Principles, including where it may have an unreasonable impact on other individual's privacy. If we refuse access for such reasons, we will advise you in writing of the refusal, our reasons and the complaint mechanisms available to you.

11. Consent:

You consent to the use or disclosure of your personal information in circumstances which are:

- a) set out in this privacy policy.
- b) clearly explained to you at the time when the information is collected from you.
- c) permitted under The Australian Privacy Principles.

12. Disclaimer:

Wolf Den and this privacy policy may be subject to applicable legislation, regulations and codes of practice. To the extent that this policy exceeds the minimum obligations of Wolf Den under the Commonwealth and Territory legislation, this policy serves as a documentation of our voluntarily self-imposed standards. While we are determined to meet those standards as best we can, to the extent permitted by law, Wolf Den is not liable if it does not adhere to any of these voluntary self-imposed standards, for any loss, liability, costs, expense or damage arising as a result of Wolf Den failing to meet any of the voluntarily self-imposed standards.

13. Contact details

If you have any queries, requests for access or correction or complaints relating to the handling of your personal information, please contact the Privacy Officer, whose contact details are as follows:



Privacy Officer
Wolf Den Services Pty Ltd
Level 5
17-19 Alberta St,
Sydney, NSW 2000

Email: privacy@wolfden.bet

We will consider any complaints and will aim to respond in writing within 30 days. Further Information about privacy concerns or complaints in Australia can be found on the Office of the Australian Privacy Commissioner's (OAIC) website at www.oaic.gov.au.