

PRIVACY POLICY

This privacy policy and cookie policy sets out the way in which your personal information is handled by Melbourne City FC Pty Ltd (ABN 39 128 569 264) (the "Club"), City in the Community (ABN 87 602 502 429) and City Football Australia Pty Ltd (ABN 63 600 975 504) (collectively referred to as "we", "our" or "us"), whether collected through one of the websites operated and managed by us (including the Club's website located at <http://www.melbournecityfc.com.au/>), or from other collection points from time to time. We are committed to protecting your personal information in accordance with the *Privacy Act 1988* (Cth), including the Australian Privacy Principles (collectively, the "Privacy Laws").

The Club is a part of the City Football Group, which is a corporate group headquartered in the UK. Some of the companies within that corporate group may be involved in helping to provide the services and communications referred to in this policy, or as requested by you from time to time.

Please note that aspects of the Club's website are operated and managed by Football Australia Limited (ACN 106 478 068) ("Football Australia"). Football Australia's policies and procedures relating to its management of a user's visits to a Football Australia managed website, including with regard to privacy matters, are provided at: <https://www.footballaustralia.com.au/privacy>

We understand that your personal information is important to you. This policy sets out how we handle your information.

WHAT INFORMATION WE COLLECT AND WHAT WE USE IT FOR

We may collect personal information directly from you via your use or purchase of the products and services on offer, your use of our website, any registration you make to participate in activities with or to receive information from us, and when you participate in our activities, competitions and promotions (doing so either for the specific reason identified at the time of collection, as is reasonably necessary for us to perform our activities, or otherwise in accordance with the Privacy Laws). By providing us with personal information, you consent to that information being collected, used, disclosed and stored in accordance with this policy.

If you do not give personal information to us, it may affect our ability to respond to your query, to provide you with products and/or services, or assess your application to be involved in a promotional activity with us.

Depending on the manner in which the information has been collected, the personal information which we collect and hold may include:

- a) Your full name;
- b) Your address, email address and telephone number(s);
- c) Your age and date of birth;
- d) Your gender, occupation, country of residence;
- e) Where a Club activity involves:
 - i. a child under 18, their parent or guardian details;
 - ii. the person's participation, details about the person's performance and participation in the activity, and emergency contact details for that person.

We typically collect information in the following circumstances:

- a) **If you contact us**, whether in person, by phone or email, SMS or other forms of communication, or via the Club website or social media platforms we may collect

personal information from you, such as your name, address, email, and telephone number, in order to respond to your enquiries, concerns or complaints.

- b) **If you join as a member of the Club** we will collect personal information such as your name, date of birth, address, delivery address, email, telephone number and credit card details. We will use these details to provide you with information relating to your membership benefits, such as membership renewal and match related information to facilitate your attendance at matches, as well as marketing offer and member-related promotions. If you no longer want to receive promotional communications, you may unsubscribe by contacting membership@melbournecityfc.com.au, however you will still receive notifications and reminders required to administer your membership.
- c) **When you purchase other products and services** we may collect personal information from you, such as your name, address, delivery address, email, telephone number and credit card details. We will use this information to supply you with the products and services, to recover debt, to help us to prevent fraud, and keep records about your purchases. If necessary, we may also record details of any disability or health needs you may have at the time of booking an event, activity or service to help to ensure your safety.
- d) **When you sign up to be kept informed about exciting promotions, news, features and activities** we may collect your personal information, such as your name, email address, phone number, date of birth and country of residence. We will use the information collected for the purposes of sending you promotions, news, features and activities, and may share the information with third party service providers to do so.
- e) **If you log in using social media** depending on how you log in we may collect your profile name/user name, profile picture, email address and date of birth. The social media information you consent to share with us will be combined with the other information you provide to us or that we collect about you. We will also collect information about your comments, posts and 'likes' to allow us to administer our membership program and fan related initiatives.
- f) **If you participate in one of our trade promotions or competitions** we will collect information such as your name, email address and phone number. We will use the information collected for the purposes of conducting the trade promotion or competition and may share the information with our commercial partners or third parties where you have provided your consent.
- g) **If you visit our offices or other premises where our activities are held** we (or a third party) may collect CCTV images of you for security purposes, or personal information for public health related contact tracing purposes.
- h) **If you attend or participate in a Club activity** either inside or outside the Club's home match stadium, we may collect images of you that may be used for promotion of the Club or a governing body, including the Australian Professional Leagues Company Pty Ltd (ACN 646 799 199) (the "League"), or for promotion of any of our or the League's commercial partners, in any media or platform (except where you have formally communicated you do not provide such consent).
- i) **If we receive an incident report regarding a safeguarding matter** at Club training sessions, on a match day, at a Club event, or otherwise relating to a Club representative or participant within a Club team, we may receive personal information of people involved in the matter, such as names, age, contact details, and images. If such an incident report is received by us, we may disclose that information to Football Australia, the League, relevant stadium management and/or regulatory authorities, such as the Victorian Police. The Club may also disclose that information to the City Football Group (and its third party safeguarding service providers) for safeguarding management purposes, which may require the disclosure, handling and storage of personal information overseas, such as to the United Kingdom.

- j) **As you move around our website** we will collect information about your visit, such as which pages you visit, how often you visit and which competitions you enter.
- k) **From our commercial partners and other third parties** we may collect information they hold about you and use it to supplement the information that you provide to us.

In addition to the above uses, we may use this information for any purpose which we notify you about when we collect your information or to which you have provided consent, or that is otherwise permitted under the Privacy Laws. We will also use this information, as well as the other information that we collect about you, to improve the quality of our websites and help build a profile of you so we can get to know you better. Also, it helps us make sure we and our commercial partners are sending you news, updates and offers that may be of interest to you.

We may also use the personal information we collect about you to create statistics and anonymised information to then share with third parties including ad networks, search engines and analytics providers.

We may disclose your personal information to third parties in the following circumstances:

- a) If requested by the League or other football governing body or any of the League's designated commercial partners for the purpose of statistical analysis, commercial development, centralised administration or any other use in accordance with that governing body's privacy policy.
- b) With suppliers, service providers and sub-contractors for the performance of any contract we enter into with them or you.
- c) With our commercial partners (except where you have elected to opt-out), for the purpose of administering a competition or promotion, to enable them to send you news, updates and offers that may be of interest to you. A current list of our commercial partners will be available for review at the club's website.
- d) To Football Australia, the League, Football Victoria, stadium management, or relevant authorities in order for the Club or those third parties to investigate and respond where there are allegations that applicable laws or regulations have been breached, including breach of Club membership terms and conditions, terms of admission to matches, and/or Football Australia or League codes of conduct.
- e) In the event that we sell or buy any business or assets, in which case we may disclose your personal information to the prospective seller or buyer of such business or assets.
- f) If we or substantially all of our assets are acquired by a third party, in which case personal information held by it about its customers will be one of the transferred assets.
- g) If we are under a duty to disclose or share your personal information in order to comply with any legal obligation (excluding contractual obligations not otherwise permitted under this privacy policy), court or police request, or to protect the rights, property, or safety of us and City Football Group, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

When sharing your personal information we will take reasonable steps to ensure that adequate safeguards are in place and that such third parties will treat your personal information securely in accordance with the Privacy Laws.

You will be given the option to consent to receiving direct marketing communications from us when we collect your personal information. This consent will remain current on an ongoing basis, unless and until you advise otherwise.

If you do not wish to receive any marketing communications from us, you can unsubscribe to

those communications at any time by following an unsubscribe option which will be included the emails we send, or by following the details in the Contacting Us section of this policy. In some circumstances we may need to contact you to obtain additional information, verify your identity or to clarify your request in order to action it.

SECURITY OF INFORMATION

We take the security of your personal information seriously and take steps to ensure your personal information is treated securely and in accordance with this policy. When you submit your credit card details, we use industry standard secure sockets layer (ssl) encryption technology to guard your information. However we cannot guarantee that any data transmission over the internet is completely secure.

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

The Club uses the services of Expeed Technology Pty Ltd trading as Sport Subs (ABN: 94 110 845 415) ("Sport Subs") for management of the Club's online store and membership processes. Any information provided to the Club or Sports Subs through those sites will be managed by Sports Subs in accordance with its privacy policy:

<https://premier.sportsubs.com.au/aleague/melbournecity/home/privacy>

and may be disclosed to the Club for use in accordance with this policy.

Our websites contain links to other websites. We are only responsible for the privacy practices on our websites. We recommend that you check the privacy and security policies and procedures of each and every other website that you visit.

All the personal information we collect about you is stored by us or our service providers on our behalf. Some personal information will be stored on data servers located in Australia. However, in some circumstances (such as to provide you with products and services) we may disclose the personal information that we hold to related entities, commercial partners and other third party suppliers located outside of Australia in the ordinary course of business, most likely to such parties located in the United Kingdom, United States of America, Singapore or China, and other countries in which those partners or their computer systems may be located from time to time. For example, multi-national service providers such as Google and Microsoft provide common cloud-based data storage service offerings, often located in jurisdictions outside of Australia. The Club or its related entities may use such or similar data storage services located outside of Australia from time to time.

By providing personal information to us, you agree to the disclosure and use of your personal information outside of Australia in accordance with the Privacy Laws and as set out in this policy.

We will take such steps as are commercially reasonable in the circumstances to ensure that the related entities, commercial partners and other third party suppliers located outside of Australia handle your personal information in a manner consistent with this policy. While you may have rights to enforce such parties' compliance with applicable data protection laws in the relevant jurisdiction, you may not necessarily have recourse against those parties under the Privacy Laws in relation to how those parties treat your personal information.

Our website is not specifically tailored to cater for provision of goods & services to EU residents. However, in the event the EU General Data Protection Regulation 2016/679 is considered to apply, the Data Protection Officer can be contacted via privacy@melbournecityfc.com.au

DATA BREACH PROCEDURES

We take (and require our service providers to take) reasonable steps to protect the personal

information we store from misuse, interference and loss, and from unauthorised access, modification or disclosure, which include electronic access restrictions, among other steps.

In the event of an eligible data breach under the Privacy Laws and *Privacy Amendment (Notifiable Data Breaches) Act 2017* (Cth), we will investigate and notify you and the Office of the Australian Information Commissioner, in accordance with our data breach procedure and response plan.

YOUR RIGHTS TO ACCESS YOUR PERSONAL INFORMATION

We take all reasonable precautions to ensure the personal information that we collect, use and disclose is accurate, complete and up-to-date. However, the accuracy of that information depends on the information you provide. We recommend that you let us know if there are any errors in your personal information and keep us up-to-date with changes to your personal information such as your contact details.

You have the right to receive a copy of the personal information that we hold about you, and to request the correction of your personal information if it is inaccurate, incomplete or out of date. You will be required to provide proof of identity in order to obtain access to your personal information. If you would like to make such a request for a copy of your data, or would like to take steps to exercise your rights, please contact us using the contact details in the Contacting Us section below.

CHILDREN'S PRIVACY POLICY

If you are under 18, please read this section of the policy and speak to your parent or guardian if you have any questions before using any of our websites and providing us with any of your personal information. If you continue to use our websites, we will assume that you have your parent and/or guardian's consent to do so.

You can use our websites without providing us with any of your personal information. If you do provide us with your personal information we will use it as set out on the website. For example if you sign up to receive a newsletter, we will use your email address to send you the newsletter and news, updates and promotions we think you might like.

We encourage you to talk with your parent/guardian about the information we send to you, and check that they are happy for you to continue to receive this information. If you do not tell us you do not want to receive this information any more, we will assume you have your parent and/or guardian's consent to continue to receive this information.

You can ask us to stop sending you marketing emails, SMS or other communications at any time. In each message we send you there will be an 'unsubscribe' option; if you follow these instructions we will stop sending the messages. You can also send us an email to using the contact details in the Contacting Us section below if you have any questions, want us to stop sending you messages or want to change any of the information you have given to us.

If you are a parent or guardian of a child who is using our website or is otherwise in contact with us, we recommend that you supervise your child while they are online and check what personal information your child is providing to us.

We make sure that any information or marketing that we send to under 18's is always age appropriate. If you have any concerns about the information your child is receiving please contact us using the contact details in the Contacting Us section below.

CONTACTING US AND MAKING COMPLAINTS

You may contact us by writing to privacy@melbournecityfc.com.au.

You may complain about our collection, use or disclosure of your personal information by contacting us using the contact details above with your full name and contact details, together

with a description of the complaint.

For example, you may wish to:

- a) request access to and seek the correction of your personal information held by us at any time;
- b) make a complaint in relation to an alleged breach of privacy; or
- c) submit a query or concern about this policy or our information handling processes.

In making a complaint, you have the option of not identifying yourself or raising a complaint through the use of a pseudonym, unless we are required by law or court or tribunal order to deal with individuals who have identified themselves, or it is impracticable for us to deal with individuals who have not identified themselves.

We will respond to your complaint within a reasonable period of time and inform you of the next steps we will take in dealing with your complaint. If we are unable to resolve your complaint, we will inform you of the steps available to you in those circumstances. Such steps may include making a complaint to the Office of the Australian Information Commissioner.

CHANGES TO THIS PRIVACY POLICY

We may change our security and privacy policies at any time by publishing the new version of the security and privacy policies on our website so we recommend that you visit this page occasionally to check what has changed. We will indicate any changes by updating the date of this Policy.

This policy was last updated in **June 2021**.

COOKIES POLICY

Football Australia manages many aspects of the Club's website, including cookies used on the website. Football Australia's policies and procedures for managing a user's visits to a Football Australia managed website, including with regard to the management of cookies, are provided at: <https://www.footballaustralia.com.au/privacy>

The online store and membership sign up pages of the Club's website is managed by Expeed Technology Pty Ltd trading as Sport Subs (ABN: 94 110 845 415) ("Sport Subs"). For information regarding Sport Subs' management of privacy matters please see <https://premier.sportsubs.com.au/aleague/melbournecity/home/privacy>

Our websites use cookies in their operation in a number of areas. If you choose not to accept our cookies, some services on our websites will not be available to you. By continuing to browse our websites, you are agreeing to our use of cookies.

a. What is a cookie?

A cookie is a small file of data, often incorporating a unique identifier, that is sent to your device browser from a website's computer. A cookie cannot read data off a user's hard drive or read cookie files created by other websites. The use of cookies is an industry standard that can be found on most major websites.

This data file stores the information you provide us with and in doing so enables us to amongst other things to 'remember' you on repeat visit and once you log in keeps you logged in as you move around the website, effectively letting you move around the website without having to keep reintroducing yourself. This helps us to provide you with a good experience when you browse our websites and also allows us to improve our websites.

We use cookies to track user trends and patterns, which enables us to understand and improve areas of our websites that fans find valuable. These cookies are also used to provide more personalised services to you on our websites and through other media. Cookies record information about your online preferences, which are then used to tailor our websites to your individual preferences. You can set your devices to accept all cookies, to notify you when a cookie is issued, or not to receive cookies at any time.

Most browsers accept cookies automatically, but you can set your browser to prevent this. If your browser's preferences allow it, each website or third party service provider is able to send a cookie to your browser.

We reserve the right to modify or amend the use of cookies at any time and for any reason. Any changes to the use of cookies posted on our websites apply as soon as they are posted. By continuing to use our websites after any changes are posted, a user or users acknowledge acceptance of those changes.

b. How do we use cookies?

We do not use cookies to collect personally identifiable information about you as a user of our websites.

Football Australia and Sport Subs do use cookies in managing parts of our website, in accordance with their respective privacy policies (links above) and may provide information relating to a user's use of our website to us. We also use a number of independent measurement, advertising and research companies. They gather information regarding the visitors to our websites using cookies, log file data and code embedded on our websites. These third-party service providers may use cookies and other technologies (such as web beacons or JavaScript) on our website in connection with online services like banner advertising, website analytics and surveys to collect information about your use of our website. The use of these technologies allows the club and its third-party service providers to evaluate a user's use of our

website, deliver customised advertising content, measure the effectiveness of the advertising and provide other services relating to website activity and internet usage. Examples of some of these technologies or third-party service providers include Google Analytics, Nielsen, AdTech, Omniture and Facebook. You can find more details in the privacy policies for those services, including information on how to opt-out of certain conduct.

We use this type of information to help improve the services we provide to our customers and members; however, we will endeavour to take such steps as are commercially reasonable in the circumstances to require third parties do not use any of this type of information for their own business or other purposes. For example, when we send you emails or other electronic messages, we may record where you open the message and click on particular links. This helps us to better understand what information is of interest to you.

We do not accept any responsibility or liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

We use the following types of cookies:

1. Strictly necessary cookies. These are cookies that are required for the operation of our websites. They include, for example, cookies that enable you to log into secure areas of our websites or make purchases.

2. Analytical/performance cookies. They allow us to recognise and count the number of visitors and to see how visitors move around our websites. This helps us to improve the way our websites work, for example, by ensuring that users are finding what they are looking for easily.

3. Functionality cookies. These are used to recognise you when you return to our websites. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

4. Targeting cookies. These cookies record your visit to our websites, the pages you have visited and the links you have followed. We will use this information to make our websites and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

c. How to reject cookies?

If you wish to restrict or block the cookies we use on our websites you can do this within your browser settings. The Help function within your browser should tell you how to do this. For more information about how to change your browser settings please see: www.aboutcookies.org.

Please be aware that in disabling cookies on our websites may affect your experience of our websites where the functionality is controlled by the use of cookies.

This policy was last updated in June **2021**.