

PRIVACY POLICY



Melbourne City FC Privacy Policy

Melbourne City FC Pty Ltd (ABN 39 128 569 264) (**Melbourne City FC**) is a football club that competes in the A-Leagues as facilitated and administered by the Australian Professional Leagues Company Pty Ltd (ACN 646 799 199) (**APLCO**) and other competitions.

This Privacy Policy applies to Melbourne City FC, City in the Community (ABN 87 602 502 429) and City Football Australia Pty Ltd (ABN 63 600 975 504) (collectively referred to as **the Club, we, our** or **us**), and details how the Club collects, holds, uses and discloses personal information, including personal information collected at live events and stadiums, on one of the websites operated and managed by us or APLCO (including membership, corporate and retail websites) (**Websites**), through mobile applications, via email and from other collection points from time to time. By "**personal information**" we mean information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not. Personal information does not include information that has been de-identified so that it is no longer about an identified individual or an individual who is reasonably identifiable. Unless otherwise stated, all references to "personal information" in this Privacy Policy also include sensitive information such as health information.

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

Our third party suppliers and commercial partners (together, our **Partners**) are independent of the Club and may have privacy policies which differ from ours. We will endeavour to state and regularly update the list of our current season Partners on our Website. Our Partners are responsible for their own privacy policies and privacy practices. Please contact our Partners directly for further information on their privacy policies.

We may amend this Privacy Policy at any time. The updated version will be available by following the 'Privacy' link on our Websites (and the date that the Privacy Policy was last updated will be displayed). We may highlight any material changes to the Privacy Policy that may impact you by notifying you by email or otherwise.

Collection of personal information

What personal information do we collect?

In the course of our business, the Club may collect personal information about you that is necessary for us to perform our functions and activities. The types of personal information we may collect from you may vary depending on the nature of our interaction with you and may include:

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- your name;
- date of birth and/or age;
- contact information (including address, mobile and/or landline numbers and email);
- country of residence;
- gender;
- ethnicity (including Aboriginal and Torres Strait Islander identification);
- cultural, philosophical and/or religious beliefs;
- occupation;
- Club membership (both current and historical);
- financial information (including full bank account numbers and/or credit or debit card numbers that you link to your account with us or give us when you use the Club's services);
- your participation in the Club and Club activities/events including details about your performance;
- name and contact information of your next of kin or, if you are under 18, your parent or guardian;
- details of purchases made and items ordered from us;
- identity documents (including your driver's licence number);
- Working with Children Check numbers and criminal history checks, as well as information used to verify such checks;
- health information (including dietary requirements and any medical and anti-doping testing and investigations);
- social media details (including your user name and profile picture and your comments, posts and 'likes');
- game attendance history, including where you purchase a ticket or use your Membership Card to obtain entry into a venue;
- images (such as CCTV images or recordings at our events or activities);

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- number and kinds of competitions you enter; and
- behaviour on our Websites and apps.

In addition, the Club may use de-identified information to carry out research, prepare submissions to a government body and to plan events and activities. “De-identified information” means any information which has been aggregated or otherwise anonymised so that it cannot be used to identify you. De-identified information may also be shared with our Partners.

How do we collect your personal information?

Where possible, we will typically collect your personal information directly from you. This may be in person (for example, when you attend an event), on the telephone (for example, if you contact us), or online (for example, if you sign up for an event online or via social media such as Facebook), including:

- when you become, or enquire about becoming, a member;
- when you provide us, or you offer or apply to supply us, with goods or services;
- when you provide information to us in any way (including by completing a form, disclosing information over the phone or via email, or providing us with a business card);
- via our Websites;
- when you subscribe to receive Club-related newsletters or other information;
- when you enter competitions or promotions we run (either directly or through our marketing agents or our Partners) or request information or make enquiries about us, our products or our services, including corporate packages, community programs and merchandise;
- when you provide feedback to us or you respond to market surveys;
- when you make a donation;
- when you sign up for, and participate in, a program, course or club product, including our community programs and match day activities; and
- when you submit a job application to us or otherwise apply for employment or to be a contractor with us either directly or through a recruitment or employment agency (if you become our employee the handling of your personal information is not covered by

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this Privacy Policy to the extent that what we do with the information is directly related to our employment relationship with you and an employee record relating to you).

You may choose to provide us with access to certain personal information stored by third parties such as social media sites (e.g., Facebook and Twitter). The information we may receive varies by site and is controlled by that site. By associating an account managed by a third party with your Club service and giving the Club access to this personal information, you agree that we may collect, store and use this information in accordance with this Privacy Policy.

We may also obtain personal information about you from third parties including our Partners and related companies, including from:

- ticketing agents, event organisers and venues when you purchase tickets to an event;
- vendors, when you purchase a Club membership package or Club-related merchandise;
- schools, community groups and sporting clubs;
- our suppliers, service providers and contractors who assist us to perform our functions and activities;
- credit reporting bodies and identity verification services;
- publicly and commercially available sources;
- our corporate partners, licensees, sponsors, suppliers and broadcasters (being our Partners);
- your representatives;
- APLCO, or any APLCO member, association, club and/or a competition administrator registered with APLCO from time to time; and
- Football Australia and other footballing bodies/authorities such as grassroots clubs, other clubs, associations and State/Territory federations.

What persons do we collect personal information about?

We may collect personal information about people who are connected to our operations and activities, including:

- players;
- ticketholders;
- administrators;

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- program participants;
- community coaches;
- members and fans;
- sponsors;
- suppliers, service providers, contractors and subcontractors (including potential suppliers, service providers, contractors and subcontractors);
- past and present employees and contractors (including applicants) (the handling of our employees' personal information is not covered by this policy to the extent that what we do with the information is directly related to our present or past employment relationship with you and an employee record relating to you);
- donors;
- research study participants;
- volunteers and other community workers; and
- any other person who comes into contact with us.

We may also collect the personal information of our suppliers and service providers' staff during the course of our business activities. This information may include your name, postal address, contact details, Working with Children Check number and position. We will collect this information directly from you, or from the applicable supplier or service provider.

We may also collect personal information from you about the recipient of third-party supplier gift cards purchased by you through our Websites using the Club's services. This information may include the recipient's name, email address and phone number. It is your responsibility to ensure that you have that person's consent to provide us and our third party supplier with this information.

Information collected about use and interaction with our Websites

Like many other websites, we may store Cookies (as this term is defined in the "Cookies and third party analytical services" section of this Privacy Policy) and other web-based files on user devices to get certain types of information when your web browser, mobile phone, or other device accesses our Websites. The information sent to us may include data on the pages you access, your computer IP address, device identifiers, the type of operating system you are using, your location, mobile network information, standard web log data and other information. Web log data includes the browser type you are using and traffic to and from our site.

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When you visit our Websites or use our services, we may also collect information about your transactions and your activities. Details on our collection of information through the use of Cookies and analytical services is set out below.

In order to help protect you from fraud and misuse of your personal information, we may collect information about your use and interaction with our Websites or the Club's services. For example, we may evaluate your computer, mobile phone or other access device to identify any malicious software or activity.

Purposes for which we collect, hold, use and disclose personal information

In general, we may collect, hold, use and disclose personal information about you for a number of purposes including:

- to organise, conduct and promote the Club's matches, community programs and other events and activities, and to provide you with our products and services;
- 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 offers and member-related promotions of the Club, our Partners and other parties;
- to manage our relationship with you and provide customer support;
- to carry out market research and surveys;
- to administer, manage and improve our Websites and provide you with access to those Websites;
- to ensure that content from our Websites is presented in the most effective manner for you and for your computer and to allow you to participate in interactive features of our Websites, when you choose to do so;
- to process transactions for the delivery of goods or services available through our Websites and send you notices about transactions;
- to learn more about your level of satisfaction, your expectations of us and our Partners, and how we can meet them (for example, in relation to the Club's services, and the goods offered by us);
- to customise, measure and improve the Club's products and services;
- to facilitate the internal business operations of the Club;

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- to investigate and take action in the event that applicable laws or regulations are breached, including terms of admission and codes of conduct;
- to contact you if you win a prize in a competition you have entered and send the prize to you;
- to verify your identity;
- to resolve disputes, collect fees, and troubleshoot problems;
- to consider you for a position at the Club for which you have applied;
- to acquire goods or services from you or from your employer;
- to perform data analytics including to improve our and our Partners' services and to better understand Club and football demographics and audience;
- for security purposes (e.g., CCTV images) or for public health related contact tracing purposes;
- for other purposes to which you have provided express or implied consent; and
- for other purposes required or authorised by or under relevant laws and regulations.

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 by APLCO, or for promotion of any of our or APLCO's Partners, in any media or platform (except where you have formally communicated you do not provide such consent).

Our functions and activities may change from time to time.

If all or some of your personal information is not collected or cannot be verified, we may be unable to provide you with the Club's services or a customised experience, engage with you, or do business with you.

How we share personal information with other parties

We may share your personal information with third parties such as:

- our related bodies corporate;
- APLCO, or any APLCO member, association, club and/or a competition administrator registered with APLCO from time to time;
- our Partners;

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- venue/stadium operators;
- our suppliers and service providers who help with our business operations including in relation to fraud prevention, identity verification, ticketing, payment collection, marketing, membership fulfilment, customer service and technology services;
- Football Australia and other footballing bodies/authorities such as grassroots clubs, other clubs, associations and State/Territory federations;
- any other affiliated institutions that we may partner with to jointly create and offer a product and/or service to you;
- parties involved in a prospective or actual transfer of our assets or business;
- any enforcement bodies, government agencies or officials, or other third parties as required by relevant laws;
- your nominated referees so that we may check your references if you are applying for a position with us;
- our insurers and our professional advisors, including our accountants, auditors and lawyers; and
- as required or authorised by law or where we have a public duty to do so, including for purposes of safety and security.

Please also note that some of these third parties may be located overseas, including in countries where the laws on processing personal information may be less stringent than in Australia. 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. As a result, your personal information may be transferred to, and stored at, a destination outside Australia, including but not limited to:

- New Zealand;
- Netherlands;
- China;
- Singapore;
- Japan;
- India;

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- United States of America; and
- United Kingdom.

Personal information may also be processed by staff or by other third parties operating outside Australia who work for us, our related body corporates, football clubs affiliated with the group or entities, or for one of our suppliers, agents, or other partners associated with us or APLCO.

When we disclose your personal information overseas, we will take reasonable steps to ensure that your personal information is held, managed and accessed by the overseas recipient in accordance with the Australian Privacy Principles.

In addition, you should note that our related bodies corporate and affiliates, Partners and third party suppliers that you buy goods or services from or contract with (even if such goods or services are purchased using the Club's services) have their own privacy policies. While we will take reasonable steps to protect your personal data, we are not responsible for their actions, including their information protection practices. In addition, 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.

If you give your personal information to one of our Partners directly or via a third party website or via a third party application, any personal information that you enter on that website or application (and not directly on the Club's Website) will be shared with the owner of the website or application. These sites are governed by their own privacy policies and you are encouraged to review their privacy policies before providing them with your personal information. The Club is not responsible for the content or information practices of such third parties.

Our Websites are not specifically tailored to cater for the 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.

Collection, use and disclosure of personal information by APLCO

APLCO may collect, access and use your personal information that is provided to the Club to fulfil its functions and activities as a service provider to the Club, to administer, develop and improve the A-Leagues, for its own internal business purposes and for any other purpose described in APLCO's Privacy Policy (see below for link). APLCO may disclose your personal information to third parties such as its suppliers, partners and related bodies corporate. APLCO may disclose your personal information overseas including to suppliers located in USA and Japan and to its related body corporate in New Zealand. If your personal information is not provided to APLCO, APLCO may not be able to provide certain products and services to you. APLCO will not collect and use your personal information to market to you unless it is on behalf

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of the Club and at the direction of the Club, and you have not opted-out of receiving such marketing material.

For more information about how APLCO handles personal information (including how to seek access to or correct your personal information, or submit a privacy complaint and how that complaint will be handled) please refer to APLCO's Privacy Policy which may be accessed via www.keepup.com.au/privacy-policy. Please contact APLCO at privacy@aplfootball.com.au in relation to any queries about the manner in which personal information is handled by APLCO.

Verification of identity

When you provide us with your personal information (including your name, date of birth and residential address) in establishing your profile with us, you consent to us disclosing that information to credit reporting bodies and requesting an assessment of whether it matches personal information held by the body to assist in verifying your identity. The credit reporting body may provide us with that assessment and use your personal information in preparing that assessment.

If all or some of your personal information is not collected or cannot be verified, we may be unable to provide you with the Club's services or a customised experience, engage with you, or do business with you.

Incident reporting regarding safeguarding matters

If we receive an incident report regarding a safeguarding matter at a Club training session, 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 within the City Football Group (including to entities related to the City Football Group), or to Football Australia, APLCO, relevant stadium management and/or regulatory authorities, such as the police.

Marketing

We may provide marketing materials from time to time, to those who have provided us with personal information, about products and services offered by us and our Partners. By providing us with your personal information, you consent to us using that information to contact you (including by telephone call, SMS, email or other communication methods such as push notifications) in relation to products, services or other offers we think may be of interest to you until you opt-out in the manner described below. We may also use your personal information to make inferences and present more relevant content, such as your preferred retailers, purchase and spending habits.

You can opt-out of receiving marketing information from us (including marketing information sent by us on behalf of our Partners) at any time by:

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- clicking the unsubscribe link in the message;
- calling us at (03) 9457 1765; or
- emailing us at privacy@melbournecityfc.com.au.

Even after you opt-out or update your marketing preferences, please allow us sufficient time to process your marketing preferences. Unless otherwise required to process your requests earlier by law, it may take up to 5 working days to process your opt-out requests in relation to receipt of electronic marketing materials such as emails and SMS, and up to 30 days for all other marketing-related requests.

Even after you've opt-out of receiving marketing communications from us, we may still contact you for transactional or informational purposes. These include, for example, customer service issues, returns or product-related inquiries, outstanding inquiries, surveys or recalls, or any questions regarding a specific query.

Minors

If you are under 18 years of age, please read this section of this Privacy Policy and speak to your parent or guardian if you have any questions before using the 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.

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.

Controlling our tracking tools

Your browser may give you the ability to control Cookies. How you do so, however, depends on your browser and the type of cookie. Certain browsers can be set to reject all browser Cookies. If you configure your computer to block all Cookies, you may disrupt certain web page features, and limit the functionality we can provide when you visit or use our Websites. If you block or delete Cookies, not all of the tracking that we have described in this Privacy Policy will stop. If you continue without changing your settings, we will assume that you are happy to receive all Cookies on our Websites. You can change your cookie settings at any time. Some browsers have a "Do Not Track" feature that lets you tell websites that you do not want to have your online activities tracked. These browser features are still not uniform, so we are not currently set up to respond to those signals.

Cookies and third party analytical services

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We may use Cookies and track IP addresses via our Websites so we can improve our services provided by our Websites and enhance your user experience.

When you access our Websites or use the Club's services, we (including APLCO, our Partners and companies we work with) may place small data files on your computer or other device. These data files may be cookies, pixel tags, "Flash cookies", or other local storage provided by your browser or associated applications (collectively **Cookies**). We use Cookies to ascertain which web pages are visited and how often, to make our Websites more user friendly, to give you a better experience when you return to a Website and to target advertising to you that we think you may be interested in. For example, Cookies allow us to save your password so you do not have to re-enter it every time you visit our Websites.

Most web browsers automatically accept Cookies. You can find information specific to your browser under the "help" menu. You are free to decline our Cookies if your browser or browser add-on permits, unless our Cookies are required to prevent fraud or ensure the security of websites we control. However, declining our Cookies may interfere with your use of our Websites and the Club's services.

Controlling online interest-based ads

We sometimes work with online advertising vendors to provide you with relevant and useful ads. This may include ads served on or through our Websites. This may also include our ads served on other companies' websites. These ads may be based on information collected by us or third parties. For example, your postal code may be used to target an ad for people in your area. These ads may also be based on your activities on our Websites or on third party websites.

Our Websites also use Google Analytics, a web analysis service of Google Inc. (Google). Google Analytics uses Cookies to monitor traffic to, and use of, the Websites. Information about the use of the Websites generated by these Cookies is generally transferred to a Google server in the USA and stored there. Google uses this information on our behalf to evaluate your Website usage, to compile reports on the Websites' activities, and to provide additional services connected with the Websites. We will not identify you to Google, and will not merge personal and non-personal information collected through this service. You can prevent the use of Google Analytics Cookies by adjusting the settings on your browser software, however, you may not be able to fully use all of the functions of the Websites if you do so.

In addition to Google Analytics, we may also use other third-party analytics tools including but not limited to Amplitude (an analytics service provided by Amplitude Inc.) to monitor, analyse and collect information about your use of the Websites.

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

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Mobile App location based services

When you download and use any of our mobile applications, we use mobile analytics software provided by third parties to collect information about the type of device you use, its operating system, your geolocation, and browsing and usage data such as how and how often you use the mobile app and from where you downloaded the mobile app. Certain features of the mobile app require that you use an existing club membership, or set up a personal profile, with a username and password, to use the feature. When you log in to your mobile app profile, we will be able to identify you. The mobile app services provider will also have access to your specific geolocation, device identification, and mobile app usage information.

We use location-based information to verify your location and send location-based content to you. We may share your geolocation data with third party ad servers that send advertisements in your area (for example sponsors). We also may work with third party providers who use technologies such as geofencing and beacons to identify fans attending a match, and contact fans via an in-app feature in order to serve unique content to enhance your game day or event experience. These service providers are permitted to use your information only for the purpose of acting on our behalf. You can opt-out of location-based services at any time by editing your location settings on your device or by emailing us at privacy@melbournecityfc.com.au.

Protecting personal information

The Club will seek to keep your personal information secure by taking reasonable steps to protect it from misuse, loss, and unauthorised access, use, modification and disclosure.

We protect your personal information using physical, technical and administrative security measures to reduce the risks of loss, misuse, unauthorised access, disclosure and alteration, including by holding information securely in electronic or physical form in access controlled premises or in electronic databases requiring logins and passwords and using industry standard secure sockets layer (**SSL**) encryption technology to guard your financial information.

We also review our security procedures periodically to consider appropriate new technology and updated methods. Only properly authorised people who have a need to access personal information to perform their job will be able to see or use that information. Even so, despite our reasonable efforts, no security measure is ever perfect or impenetrable.

Where we have given you (or where you have chosen) a password that enables you to access certain parts of our Websites, you are responsible for keeping this password confidential. You should not share the password with anyone and should change it regularly.

If you are considering sending us any other personal information through one of our Websites or via any other electronic means, please be aware that the information may be insecure in transit, particularly where no encryption is used (e.g. email, standard HTTP). Any transmission is therefore at your own risk.

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Requesting access to, and correction of, personal information

If you wish to obtain access to and/or correct your personal information held by the Club, please contact us on:

Email: privacy@melbournecityfc.com.au

Phone: (03) 9457 1765

Mail:

Head of Legal
Melbourne City FC
PO Box 4016 Narre Warren South, Victoria, 3805

We will generally provide you with access to your personal information if practicable, and will take reasonable steps to amend any personal information about you which is accurate or out of date. In some circumstances and in accordance with the Privacy Act 1988 (Cth), we may not permit you access to your personal information, or may refuse to correct your personal information, in which case we will notify you of the reasons for this decision.

Resolving your concerns

If you have any queries or would like to make a complaint relating to our Privacy Policy or regarding the Club's management or handling of your personal information, please contact our Privacy Officer, on ph (03) 9457 1765, via email at privacy@melbournecityfc.com.au, or in writing at

Head of Legal
Melbourne City FC
PO Box 4016 Narre Warren South, Victoria, 3805.

We will seek to provide written acknowledgement of your complaint within 7 days of receipt. We will endeavour to investigate and advise you of the steps we have taken to resolve your complaint within 30 days of receipt of your complaint.

It is our intention to use our best endeavours to resolve any complaint to your satisfaction. However, if you are unhappy with our response, you may contact the Office of the Australian Information Commissioner who may investigate your complaint further.

In the event of an eligible data breach under the Privacy Act 1988 (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.

Updates to this Privacy Policy

This Privacy Policy was last updated on May 2022.