



Cowboys Rugby League Football Club Limited COWBOYS LEAGUES CLUB LTD.

Cowboys Leagues Club Limited

PRIVACY POLICY & PROCEDURE

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1. Purpose

This Privacy Policy applies to Cowboys Leagues Club Limited and its related bodies corporate, including Cowboys Rugby League Football Limited ("the Cowboys", "we", "our" or "us").

The Cowboys are bound by the *Privacy Act 1988* (Cth) as amended (including the Australian Privacy Principles) (**Privacy Act**). This Privacy Policy describes how we collect, use, disclose and otherwise handle your personal information.

Personal information means any information about an identified individual or an individual who is reasonably identifiable, whether the information is true or not and whether the information is recorded in a material form or not.

Unless the context otherwise requires, capitalised terms in this Privacy Policy have the meaning given to such terms in the National Rugby League's (NRL) Privacy Policy located at <https://www.nrl.com/privacy-policy>.

The Cowboys recognise the importance of your privacy and your rights in relation to your personal information and is committed to complying with applicable privacy laws (including the Privacy Act and GDPR).

2. Dealing with us anonymously or using a pseudonym

Depending on the nature of your transaction with us, wherever lawful and practicable, you have the option to remain anonymous or use a pseudonym when dealing with us.

However, in most cases, we will need to know some information about you in order to provide products, services or support to you. For example, if you contact us with a query, we need your contact information to respond to you. If you do not provide us with all relevant information, we may not be able to provide you with our products, services or support to you.

3. How we share your information as part of the rugby league exchange

This section only applies to the Cowboys Rugby League Football Limited as part of the Rugby League Exchange.

The Cowboys Rugby League Football Limited are always seeking to better understand our player and fan preferences including by analysing your personal information to understand trends and interests. The Cowboys have, in conjunction with the NRL, other Clubs, Queensland Rugby League (QRL), New South Wales Rugby League (NSWRL), Country League of New South Wales and selected third parties, established a data storage architecture and data sharing platform for processing personal information with this aim (Rugby League Exchange).

The NRL will be responsible for the maintenance and administration of the Rugby League Exchange. The Cowboys will share your personal information with the NRL as part of the Rugby League Exchange in order to facilitate analysis of fan behaviour and preferences to improve fan support, fan offerings, provide more targeted content and products and any other purposes described in the NRL's Privacy Policy. We encourage you to read the NRL's Privacy Policy to understand how your personal information will be handled in relation to the Rugby League Exchange.

4. What kinds of personal information we collect

The types of personal information the Cowboys collect depends on our dealings with you, but may include (without limitation):

- a) your name, gender, date of birth, occupation, and contact details such as email, address and phone number;
- b) memberships, subscriptions and attendance history at the Cowboys matches (whether you have used your membership to purchase tickets, or as a casual ticket purchaser);
- c) purchasing preferences and payment information which we collect when you buy tickets, purchase merchandise and/or as part of competitions and promotions;
- d) your preferences regarding products and services (such as your favourite Cowboys players); and
- e) in the case of job applicants, your qualifications, education, training, work experience and skills.

We also use cookies, web beacons and other technologies on our website to collect information about your usage of our services. For instance, we may collect information about third party websites you visit to better understand your preferences and what types of products and services you may be interested in. Such information is usually aggregated and anonymous and ordinarily does not constitute personal information. To the extent that your identity is reasonably identifiable from such information, we will treat that information as personal information in accordance with this Privacy Policy. You can manage cookies in the settings of your browser or through social network website or app settings.

We also collect personal information provided to us:

- a) on business cards submitted to us through business card draws; and
- b) on survey forms and competition forms for surveys and competitions we run.

The Cowboys generally do not collect sensitive information such as health information. If we do, we will only do so if:

- a) you have expressly consented to the collection of such sensitive information;
- b) the Cowboys are specifically permitted to do so under the NRL Rules, including for health, medical and anti-doping testing purposes and investigation of disputes (whatever the nature of the dispute);
- c) the collection is required or authorised by law; or
- d) the collection is otherwise permitted under applicable privacy laws (including the Privacy Act and GDPR).

5. How personal information is collected

The Cowboys generally collect personal information directly from you, such as when you submit it to us, for example:

- a) when you sign up to be a member with us, or to participate in any Cowboys activities (including online competitions that we run);
- b) when you make enquiries or correspond with us;
- c) when you transact or make a purchase with us; and
- d) otherwise through your interaction with us, whether in-person or online (including through our websites, social media accounts, and chatbots).

The Cowboys may also collect personal information from:

- a) the NRL, Queensland Rugby League, New South Wales Rugby League and selected third parties (for instance, Ticketek and Ticketmaster);
- b) a third party (such as a sponsor or corporate partner of the Cowboys); and
- c) information that is on public record.

Where we collect your information from another entity, and we are permitted to collect such information under the Privacy Act, we will take such steps as are reasonable in the circumstances to notify you of the matters prescribed in the Australian Privacy Principles, including the fact that we have so collected the information, and the circumstances of that collection.

6. Collection of sensitive information

This section largely relates to the Cowboys' staff, volunteers, program participants and players.

We may collect sensitive information about you where it is reasonably necessary and only to the extent it relates to our organisation's activities.

Sensitive information that we may collect includes health information and racial or ethnic origin, for the purposes as outlined in the section below.

7. The purposes for which personal information is collected, used and disclosed

Your personal information will only be used and disclosed for:

- a) the primary purpose for which it was collected;
- b) a related secondary purpose;
- c) in accordance with any express consent you grant the Cowboys; or
- d) as otherwise lawfully required or permitted (e.g. where your personal information is requested by a law enforcement agency).

Different Cowboys entities may use and disclose personal information for different purposes, based on the functions and activities carried out by the relevant Cowboys entity.

For example, personal information we collect may be used for one or more of the following primary and related purposes:

- a) entering into a contract with you, including to provide you with our products and services that you have requested and delivering goods to you;

- b) processing your membership and enrolment applications and verifying your identity (including your age);
- c) from time to time, carrying out competitions and administering your participation in competitions that you have signed up;
- d) transacting with you, including processing payments of memberships and donations;
- e) responding to your queries and complaints;
- f) administering our membership benefits to you;
- g) managing Cowboys membership and supporters;
- h) conduct our other functions including entertainment, community engagement and support, merchandise, sponsorship, hospitality, training and education;
- i) assessing your suitability for employment where you are a job applicant;
- j) otherwise, administering our business and complying with applicable laws.

In the case of Cowboys Rugby League Football Limited, we may also use or disclose your personal information to administer the North Queensland Cowboys NRL team, including:

- a) organising, conducting and promoting the Cowboys including conducting and promoting Cowboys games (for instance, providing you information about upcoming ticket offers and deals for the next home matches);
- b) promotion and sale of North Queensland Cowboys merchandise; and
- c) complying with the NRL Rules.

In the case of Cowboys Leagues Club Limited, we may also use or disclose your personal information to administer the Cowboys Leagues Club including:

- a) permitting entry into any establishment under our ownership or control; and
- b) providing you with our products and services at our bars, restaurants, function rooms, and other entertainment and gaming facilities, and our Team Shop; and
- c) providing you with membership benefits including rewards and discounts on food and beverages, merchandise at our Cowboys Team Shop.

The Cowboys may also share and disclose your personal information (other than sensitive information) to our related bodies corporate, as permitted by the Privacy Act. However, any use of such personal information so collected will be managed in accordance with this Privacy Policy.

8. Use or disclosure of sensitive information

We will only use or disclose your sensitive information for the primary purpose for which it was collected, a directly related secondary purpose that you would reasonably expect us to use or disclose, as required or permitted by law, or otherwise only with your consent.

For example, we may use sensitive information such as health information to provide you with services at our Football programs. We will not use sensitive information for any marketing purposes.

9. Direct Marketing

The Cowboys may use your personal information (other than sensitive information) to send you marketing communications if:

- a) you would reasonably expect your personal information would be used or disclosed for direct marketing, but only if we collected your personal information from you directly (including for example, personal information collected to fulfil an order); or

- b) otherwise, you have expressly consented to receive direct marketing communications, and
- c) the Cowboys have provided a simple means by which you can request not to receive direct marketing; and you have not made a request not to receive direct marketing.

In each direct marketing communication, the Cowboys provide an unsubscribe option. If you do not wish to receive direct marketing, please unsubscribe through the link.

10. Disclosing personal information to third parties

The Cowboys may disclose your personal information to third parties as part of our functions and activities including (without limitation):

- a) delivery, courier and postal organisations: we may disclose your personal information to delivery, courier and postal organisations in order to deliver merchandise you order;
- b) the NRL, other Clubs, QRL, NSWRL, Country League of New South Wales and selected third parties (for instance, Ticketek and Ticketmaster): we may disclose your personal information as part of the Rugby League Exchange. The NRL and selected third parties may send you information about products and services which the NRL believes will be of interest to you. If you do not wish to receive information from the NRL, please opt out from such promotional and marketing information via your NRL account, links in emails and other communication we send to you from time to time or contact the NRL's Privacy Officer in accordance with the NRL Privacy Policy. If you do not wish to receive information from other selected third parties, please opt out from such promotional and marketing information as part of the relevant organisation's preference centre;
- c) law enforcement and emergency services agencies: we may disclose your personal information where required or authorised to do so by law, including in emergency situations and to assist law enforcement agencies with active investigations. We will always ensure that those to whom we disclose your personal information have the legal right to receive it; and
- d) marketing and promotions: we engage email marketing providers, market research companies, promotions management and other data analytics companies to perform direct marketing on our behalf. You will always have the right to opt out of receiving promotional materials from us.
- e) The Cowboys may also disclose your information to other service providers such as IT cloud service providers, ticketing agents, mail houses and other similar third party organisations. For example, the Cowboys use third party credit card payment gateway services on our website. If you pay for tickets or services through the Cowboys' website, the Cowboys will be required to provide certain financial details to the third-party service provider to effect the transaction. The Cowboys require these third party organisations to keep your contact details and personal information confidential and only use them to provide services to the Cowboys.

11. Data quality and security

We understand you have entrusted us with the protection of your personal information. As such, we will take reasonable steps to protect your personal information from misuse, loss, unauthorized access, modification or disclosure. This includes engaging reputable third party service providers and ensuring that we engage (where possible and practical to do so) in best practice security systems and procedures.

We may store your personal information in hard copy at the Cowboys office or in electronic records in our IT systems. We implement a range of physical and electronic security measures to protect the personal information that we hold, including ensuring that hard copies are stored securely and controlling access to IT systems through use of passwords.

If we no longer require your personal information for any purpose, we will take such steps as are reasonable in the circumstances to destroy the information or ensure that it is de-identified.

12. Access and correction

You can access, review and manage your personal information through:

- a) your NRL Account (using your login credentials), if you have an NRL account;
- b) your MyCowboys Account manager, if you have an account with us;
- c) communications preferences via links in emails and other communications we send to you from time to time; or
- d) contacting our Privacy Officer (see "inquires and complaints" below).

You will be responsible for ensuring your personal information remains accurate, complete and up to date. Please ensure that any written request for access or correction addressed to our Privacy Officer provides adequate detail that identifies what personal information you want access to or corrected.

Where your request to access your personal information will require the Cowboys to incur costs (such costs not to apply to the making a request, but the providing of access to the personal information), we may charge you an access fee to cover those costs (for instance, reasonable staff costs in searching for, locating and retrieving the requested personal information). We will inform you of any such charges prior to them being incurred. We will not charge for any corrections to personal information.

In certain circumstances, we may refuse to provide you access to your personal information. Where we refuse you access, we will provide you with a written explanation as to the reasons for the rejection (for instance, we may refuse to disclose personal information to you where such access would have an unreasonable impact on the privacy of other individuals).

13. Transborder data flows

Other than as specified below, the Cowboys will not disclose your personal information to an overseas recipient unless we have first taken steps reasonable in the circumstances to ensure that the personal information that we disclose will not be held, used or disclosed by the recipient of the information inconsistently with, or otherwise in breach of, applicable privacy laws (including the Privacy Act and GDPR). For example, the Cowboys may adopt appropriate contractual clauses with overseas recipients that ensure their compliance with applicable privacy laws (including the Privacy Act and GDPR).

We may disclose your personal information to overseas recipients for things such as processing membership and hosting services, most likely in China, Singapore, the United States and New Zealand, although countries where such recipients are located may vary.

We may also disclose personal information about you to someone who is in a foreign country if:

- a) we reasonably believe that the recipient is subject to a law or binding scheme that has the effect of protecting the information in a way that is, overall, substantially similar to applicable privacy laws (including the Privacy Act and GDPR) and there are mechanisms available to you to enforce that protection or scheme;
- b) you expressly consent to the transfer after we have informed you that the applicable privacy laws (including the Privacy Act and GDPR) will no longer apply if you provide your express consent; or
- c) the entity to which we disclose your personal information is in a jurisdiction prescribed under the Privacy Act for the purposes of Australian Privacy Principle 8.3.

14. Notifiable data breaches scheme

In the event of any loss, or unauthorised access or disclosure of your personal information that is likely to result in serious harm to you, the Cowboys, with the assistance of the NRL where relevant, will investigate and notify you and where applicable the relevant supervisory authority (e.g. the Australian Information Commissioner) within 72 hours of becoming aware of the loss, or unauthorised access or disclosure, in accordance with applicable privacy laws (including the Privacy Act and GDPR).

15. Inquiries and complaints

All inquiries and complaints concerning your personal information, including in respect of alleged breaches of this Privacy Policy and/or applicable privacy laws (including the Privacy Act and GDPR), should be directed to the Cowboys' Privacy Officer:

The Privacy Officer
North Queensland Cowboys

Subject: Attention: Privacy Officer
privacy@cowboys.com.au

26 Graham Murray Place
Railway Estate QLD 4810

At all times, privacy inquiries and complaints will be treated seriously, dealt with promptly and confidentially, and will not affect your existing obligations or commercial arrangements with the Cowboys.

If you are not satisfied with the outcome, or if you would like to complain about how we handle your personal information, you may contact the Office of the Australian Information Commissioner:

Office of the Australian Information Commissioner
Website: www.oaic.gov.au
Phone: 1300 363 992

GPO Box 5288
Sydney NSW 2001

Privacy Policy updates

This Privacy Policy was updated in January 2025. We may update this Privacy Policy from time to time, in which case we will post the updated version of the Privacy Policy on our website but may not personally notify you. As such, please check back periodically to see if our Privacy Policy has been updated.

Endorsed as version approved by Board of Cowboys Rugby League Limited:



Jeff Reibel
Chief Executive Officer

04/07/25
Date: _____

Endorsed as version approved by Board of Cowboys Leagues Club Limited:



Clint Williams (Jul 4, 2025 12:38 GMT+10)

Clint Williams
General Manager

04/07/25
Date: _____

MODIFICATION HISTORY					
Version	Date	Approval	Sections Modified	Details of amendments / advisory sources	Review Date
1	June 2021	CEO	All	New Policy	June 2023
2	February 2025	Board		Policy amendments to comply with Privacy Act 1988 and to share information across the Group.	September 2027
3	June 2025	Board		Amendments to remove references to the Charity throughout the Policy	September 2027


POLICY & PROCEDURE - Privacy Policy & Procedure - June 2025


Final Audit Report


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