

CLUTCH CLUB — PRIVACY POLICY

Last updated: 3/11/2025

Welcome to **Clutch Club Operations Pty Ltd** (“**Clutch Club**”) (ABN 76 687 518 047) (referred to in this policy as “**we**”, “**our**”, “**us**”). This document sets out our Privacy Policy.

We take our privacy obligations seriously and we’ve created this Privacy Policy to explain how we store, maintain, use and disclose personal information.

We are committed to preventing serious invasions of privacy and ensuring the protection of your personal information, so you can contact us using the details below if you have any questions or concerns.

By using our website, signing up as a Member, or participating in our Giveaways, you agree to this Privacy Policy.

We may change this Privacy Policy from time to time by posting an updated copy on our website and we encourage you to check our website regularly to ensure that you are aware of our most current policy.

1. TYPES OF PERSONAL INFORMATION WE COLLECT

The personal information we collect may include:

- (a) your name;
- (b) date of birth and age (to confirm eligibility);
- (c) email address, phone number, and postal address;
- (d) social media information;
- (e) payment details (processed securely by Stripe – we do not store full card details);
- (f) Membership details (tier, subscription status, entries allocated);
- (g) Giveaway results (including whether you have won a prize);
- (h) your device information, IP address, and browsing activity on our website (via cookies or analytics tools); and
- (i) any other information you provide directly to us (for example, when contacting us).

2. HOW WE COLLECT PERSONAL INFORMATION

We may collect personal information either directly from you, or from third parties, including where you:

- (a) sign up for a Membership on our website;
- (b) pay your subscription fees (via Stripe);
- (c) interact with us by email, social media, or phone;
- (d) receive goods or services from us;
- (e) submit any of our online sign up forms; and
- (f) visit our website (via cookies and analytics).

We may collect information when you use our website or social media pages through cookies, analytics, and similar technologies. Cookies are small files stored on your device that help us recognise you, improve our website, and analyse usage. You can disable cookies in your browser, but some features of the website may not work properly. For more details, see our **Cookies Policy** [<https://clutchclub.com.au/legal/>].

3. HOW WE USE YOUR PERSONAL INFORMATION

We collect and use personal information to:

- (a) manage your Membership and process subscription payments;
- (b) allocate Giveaway entries and conduct automated random draws;
- (c) notify winners and deliver prizes;

- (d) publish winners' first name and the first initial of their surname on our website and social media for transparency;
- (e) provide you with discount codes and partner offers;
- (f) improve and optimise our services and website;
- (g) comply with legal and regulatory obligations (including trade promotion lottery permit conditions);
- (h) send you marketing communications (which you may opt out of at any time);
- (i) send you administrative messages, reminders, notices, updates, security alerts, and other information requested by you; and
- (j) to consider an application of employment from you.

4. AUTOMATED DECISION-MAKING

Our Giveaway draws are conducted using automated systems that randomly select winners from eligible entries. This ensures draws are run fairly, transparently, and without bias. All our draws are run through government certified website Random Prize Draws www.randomdraws.com.au

Automated systems may also be used to manage Membership entries and subscription billing. These processes do not involve profiling or credit scoring.

If you have concerns about an automated process, you may contact us to request a review.

5. DISCLOSURE OF PERSONAL INFORMATION

We may disclose your personal information to:

- (a) service providers such as Stripe (payment processing), IT and marketing providers, and cloud hosting services;
- (b) our partner brands where reasonably necessary to provide discount offers or deliver prizes;
- (c) regulators, if required by law or permit conditions; and
- (d) other third parties with your consent.

Some of these service providers may be located outside Australia. Where that occurs, we will take reasonable steps to ensure your information is protected in line with Australian standards.

6. SECURITY

We take reasonable steps to ensure your personal information is secure and protected from misuse or unauthorised access. Our systems use password protections, and we use a range of administrative and technical measures to protect these systems. However, no system is completely secure, and we cannot guarantee the absolute security of your information.

7. LINKS

Our website may contain links to other websites. Those links are provided for convenience and may not remain current or be maintained. We are not responsible for the privacy practices of those linked websites and we suggest you review the privacy policies of those websites before using them.

8. ACCESSING AND CORRECTING YOUR INFORMATION

You may request access to the personal information we hold about you or ask us to correct it if it is inaccurate or out of date, by contacting us using the details below. We may need to verify your identity before processing your request.

We will respond to access and correction requests within a reasonable timeframe.

9. COMPLAINTS

If you believe we have mishandled your personal information, please contact us using the details below. We will investigate your complaint and respond within a reasonable period. If you are not

satisfied with our response, you may also contact the **Office of the Australian Information Commissioner (OAIC)** at www.oaic.gov.au.

10. CONTACT US

If you have questions about this Privacy Policy or our privacy practices, please contact us at admin@clutchclub.com.au