

# ClutchPlay Privacy Policy

**Updated October 26<sup>th</sup> 2025**

ClutchPlay, operated by RP Works Pty Ltd (“we”, “us”, “our”), is committed to protecting your privacy. This Privacy Policy outlines how we collect, use, store, disclose, and safeguard your Personal Information (PI) when you use our website, mobile application and services.

## **Personal Information**

The kinds of PI that we generally collect about you are:

- 1.** Name
- 2.** Residential address
- 3.** Date of birth
- 4.** Email address
- 5.** Phone number
- 6.** Personally submitted preferences and service usage information
- 7.** Financial information, such as debit card number or bank account information
- 8.** Location data
- 9.** IP address
- 10.** Gaming activities and behavioural data
- 11.** Information we may have to collect to satisfy our legislative requirements, such as identity verification information (i.e., licence and/or passport details), information from screening against sanction watchlists and source of funds information
- 12.** Information relevant to the subject of a support request you make or a complaint from a regulator or other appropriate sources that relate to you or your account
- 13.** Feedback you provide us about our Services and interactions with us
- 14.** Gaming activities and behavioural data including interactions with the website and marketing messages
- 15.** Technical information, such as date and time you visited our site or app or took an action, IP address, login details, your location, or browser settings

## How We Collect Data

We generally collect information via direct user input, Twitch OAuth authentication, automated logs and analytics (via Firebase and Google Analytics), Paypal, Didit identity solutions, withdrawal requests, and backend service logs.

## Purpose of Data Collection

ClutchPlay will collect your PI for the following purposes:

- To process your application to become a member of ClutchPlay (“Member”)
- To operate your Member gaming account and to provide services to you as a Member
- To investigate any submissions or disputes
- To respond to enquiries and complaints from you and to establish, exercise or defend any legal claims
- For market and business analysis and research
- To develop new products and services and to tailor our services to suit your needs
- To promote and market our products and services to you
- To administer our business operations, including our risk and liability management
- To comply with legal and statutory obligations that ClutchPlay may fall under. E.g. In relation to customer identity verification and reporting obligations imposed by the *Anti-Money Laundering and Counter Terrorism Act 2006* (Cth) (AML/CTF Act)
- For taking appropriate action in relation to suspected unlawful activity, fraud or misconduct or otherwise to ensure the safety and security of its services

ClutchPlay only collects information about you when you engage with ClutchPlay by using the website, mobile application or contact us. We may be required by law to only deal with identified individuals (such as under the AML/CTF Act).

If you do not provide ClutchPlay with the PI we request, we may be unable to process your application to become a Member, provide you with our services or respond to your enquiry or complaint.

By becoming a Member or otherwise choosing to provide ClutchPlay with PI, you consent to ClutchPlay collecting, using and disclosing your PI for the above purposes.

## **Disclosure**

PI collected by ClutchPlay may be disclosed to a third party in the following circumstances:

1. To provide you with the services you have requested
2. To service providers and professional advisers for the purposes of providing services to us
3. To business partners for the purposes of our business relationship with them
4. Where the disclosure is required or authorised by law
5. To notify the relevant bodies of any activity ClutchPlay considers to be unusual or suspicious
6. To verify your identity that may be required by the AML/CTF Act
7. To related bodies corporate, and actual or prospective purchasers of all or a part of ClutchPlay's business, and their advisers
8. Where you have consented to its disclosure either expressly or by the circumstances and your conduct.

ClutchPlay may disclose PI overseas, including service providers. We will take reasonable steps to ensure that any PI which ClutchPlay discloses to a third party is protected by that party in accordance with this Privacy Policy and any relevant laws.

## **Identity verification**

We will use identity verification services to confirm your identity and ensure compliance with relevant laws.

To assist us in verifying your identity, we may disclose your personal information (including your name, address and date of birth) to third parties, including Didit Identity Solutions, a service that is GDPR compliant and certified to ISO/IEC 27001, 27017 and 27018 standards.

Before we disclose your PI to these services, we will obtain your consent to do so.

## Security of Personal Information

ClutchPlay will take reasonable steps to ensure your PI is stored in a secure environment, which is accessed only by authorised persons.

ClutchPlay will take reasonable steps to protect the PI ClutchPlay holds from misuse, loss and unauthorised access, modification and disclosure including by using password protected systems and databases and Secure Socket Layer (“SSL”) technology.

ClutchPlay's employees, agents and contractors are required to maintain the confidentiality of Members' PI and gaming behaviour.

Remember to always log out of your account when you have completed your time on the website or mobile application. This is particularly important if you share a device with another person. Ultimately, you are responsible for the security of and access to your own computer, mobile device or any other handset used to access the website.

ClutchPlay will take reasonable steps to destroy or permanently de-identify the PI we hold when it is no longer required for any purpose permitted under our legal obligations. These may include under the *Anti Money Laundering and Counter Terrorism Financing Act 2006* (Cth) requiring retention of certain PI for a certain period to time. If you believe we hold PI about you that we should not, you may request deletion of your PI by contacting [contact@clutchplay.com.au](mailto:contact@clutchplay.com.au). Any requests made for the deletion of PI will be reviewed in accordance with this policy.

## Children under the age of 18

ClutchPlay takes seriously its responsibility to exclude individuals under 18 years of age from accessing our services. Our platform is intended solely for persons aged 18 years or older. We do not knowingly collect, maintain, or use personal information from anyone under 18.

If you are under 18, you must not create a Member account, use our website or mobile application, enter any competition, or provide any personal information to us, including your name, address, phone number, email address, or any username you may use.

If we become aware that we have collected personal information from a person under 18, we will promptly delete that information. Parents and guardians are encouraged to monitor their children's online activities and, where appropriate, use internet or application filtering software to help prevent minors from accessing age-restricted services.

## **Updating your Personal Information**

You can access and review the personal information ClutchPlay holds about you at any time by logging into your account and selecting “Account Details” on your profile page.

ClutchPlay takes reasonable steps to ensure that the personal information we collect, use, and disclose is accurate, complete, and up to date. Members can update or correct their personal information directly through the “Account Details” section at any time. From time to time, ClutchPlay may also contact you to confirm or update your details to ensure your information remains current.

## **Contact Us**

If you have any queries, corrections or complaints relating to the handling of your PI, please contact us: [contact@clutchplay.com.au](mailto:contact@clutchplay.com.au).

