

WhiteWolves Gaming Studios | Privacy Department

Privacy Policy

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1. Policy Statement

WhiteWolves Gaming Studios and its related entities (Battlefield Horizon Studios, OuterLight Studios, and Open Road Studios) are required to comply with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs). This policy outlines how the WhiteWolves Creative Network handles personal information in accordance with all applicable Commonwealth and state privacy legislation.

2. Purpose

This policy exists to:

- Outline how the WhiteWolves Creative Network collects, manages, uses, and protects individuals' personal information to ensure full compliance with Commonwealth and state privacy legislation
- Support subscribers, community members, content creators, and collaborators in understanding their privacy rights
- Establish clear standards for privacy practices across all four public-facing studios
- Ensure transparency in how personal data is handled across YouTube channels, website platforms, events, and community engagement

3. Scope

This policy applies to WhiteWolves Gaming Studios, Battlefield Horizon Studios, OuterLight Studios, and Open Road Studios (collectively, the WhiteWolves Creative Network), as registered with ASIC under Business Name Registration (ABN 74 519 655 814, Registration Date 30 June 2026).

This policy applies to all individuals whose personal information is collected by the network, including YouTube channel subscribers, WolfPack community members, website visitors, event attendees, content collaborators, employees, contractors, and related support personnel.

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4. Privacy Principles and Practices

4.1 Open and Transparent Management of Personal Information

The WhiteWolves Creative Network maintains this Privacy Policy and makes it available to all subscribers, community members, and visitors free of charge and in an accessible format. This policy is available at whitewolvesgamingstudios.com.au and other relevant studio websites.

Enquiries or complaints about our Privacy Policy can be directed to:

- Email: privacy@whitewolvesgamingstudios.com.au
- Contact: Through the official WhiteWolves Gaming Studios website

4.2 Collection of Solicited Personal Information

The WhiteWolves Creative Network only collects personal information that is lawful and reasonably necessary for the provision of services and community engagement. This may include, but is not limited to:

- Contact details (name, email address, physical address)
- Usernames and platform identifiers (YouTube, social media)
- Subscription and membership preferences
- Event attendance information and registration details
- Content creator or collaborator information
- Payment and billing information for transactions or donations
- Feedback, survey responses, and community engagement data
- For employees and contractors: employment-related information including contact details, qualifications, and performance records

Where collection of sensitive information is required, explicit consent will be obtained at the point of collection unless the collection is required by law or is necessary to prevent or lessen a serious threat to an individual.

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4.3 Notification of Collection

The WhiteWolves Creative Network takes reasonable steps to ensure that individuals are aware of the following at or before the time of collection:

- The identity of the studios and how to contact us
- The purpose for which personal information is being collected
- Consequences (if any) if information is not provided
- Third parties with whom information may be disclosed
- How individuals can access and correct their personal information
- How to lodge privacy-related complaints
- Whether personal information will be disclosed to overseas recipients and which countries those recipients are located in (where practicable)

4.4 Use of Personal Information

Personal information is used only for the purpose for which it was collected, where it would be reasonably expected, or with the individual's consent. The network may use personal information to:

- Provide studio services, streams, content, and community engagement
- Send communications about events, updates, and new content
- Assess quality and make improvements to service delivery
- Respond to enquiries and support requests
- Manage subscriptions, memberships, and donations
- Facilitate community interaction through approved channels

4.5 Disclosure of Personal Information

The WhiteWolves Creative Network will only disclose personal information with the individual's consent. Exceptions to this requirement include disclosure where:

- Required to lessen or prevent a serious threat to life, health, or safety
- Required in relation to suspected unlawful activity or serious misconduct
- Required as part of mandatory reporting obligations
- Required or authorised by law
- Required for legal proceedings or enforcement activities

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- Required as part of a service contract or agreement

When personal information is disclosed without authorisation under these exceptions, written documentation will be retained outlining the information disclosed, recipient, and reason for disclosure.

4.6 Direct Marketing and Communications

The WhiteWolves Creative Network may send communications to subscribers and community members regarding studio services, events, and content if the communications could be reasonably expected or where explicit consent has been provided. All marketing communications will provide a simple method for individuals to opt out. Opt-out requests will be processed within a reasonable timeframe.

The network will never sell personal information to third parties for marketing purposes unless written consent has been explicitly provided.

4.7 Website Data Collection and Cookies

The WhiteWolves Creative Network websites collect data to enhance user experience. This may include submissions, enquiry forms, email communications, and cookies for website functionality and analytics. Cookies are used to enhance website performance and may be used for marketing purposes and improvement of services.

Where website data is used for marketing purposes, individuals will be given the option to opt out. Analytics data is used to understand audience engagement and improve content quality.

4.8 Data Quality and Security

The WhiteWolves Creative Network takes all reasonable measures to ensure that personal information is accurate, up to date, complete, and relevant. Records identified as inaccurate or requiring updating will be amended immediately.

Personal information is protected from misuse, interference, loss, and unauthorised access, modification, or disclosure through appropriate security measures. Personal records are stored securely and are accessible only to authorised personnel who require the information.

Where the network no longer requires personal information, all reasonable steps will be taken to destroy or de-identify the information unless the information forms part of a legal requirement to retain it.

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4.9 Cross-border Disclosure

The WhiteWolves Creative Network will not disclose personal information to an interstate or overseas recipient unless:

- The individual is fully informed and has consented to the disclosure
- The recipient is subject to an information handling law providing substantially similar protections
- The recipient is party to an enforceable contract including adherence to the APPs
- The disclosure has been assessed as allowable under the APPs or applicable law

4.10 Artificial Intelligence and Automated Decision-Making

Any use of artificial intelligence or automated tools involving personal information must be clearly disclosed to users. AI tools including chatbots must be clearly identified. The use of AI decision-making in any process must be disclosed to individuals prior to use.

Personal information will not be entered into publicly available generative AI tools without explicit consent.

4.11 Access to Personal Information

If the network holds personal information about an individual, the individual may request access to that information within a reasonable timeframe (typically within 30 calendar days or as prescribed by law), unless access is refused on lawful grounds.

Individuals may request access by contacting privacy@whitewolvesgamingstudios.com.au. Information will be provided in a format suitable to the recipient where reasonable and practicable.

The network may refuse access if giving access would:

- Pose a serious threat to life, health, or safety of any individual
- Have an unreasonable impact on the privacy of other individuals
- Be frivolous or vexatious
- Relate to an existing or anticipated legal proceeding
- Prejudice negotiations
- Be unlawful
- Be required or authorised by law or court order
- Prejudice investigations into suspected unlawful activity

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Any refusal to provide access will be given in writing including the reason for refusal and information about the complaints process.

4.12 Correction of Personal Information

At the request of an individual, the network will take all reasonable steps to correct personal information and ensure it is accurate, up to date, complete, relevant, and not misleading.

When personal information is corrected, the network will:

- Respond within 30 calendar days from receipt of the request
- Record the correction in the individual's file with details of who made the correction and when
- Notify other relevant third parties of the correction if required for service delivery
- Advise the individual in writing if correction is refused, including the reason and complaint process
- Not charge the individual for making requests or correcting information

4.13 Privacy Complaints

Individuals who wish to make a privacy complaint may do so verbally, in writing, or online through privacy@whitewolvesgamingstudios.com.au or the official website contact form.

All complaints will be addressed promptly and seriously. If dissatisfied with the outcome, individuals may lodge a complaint with the Office of the Australian Information Commissioner (www.oaic.gov.au).

4.14 Notifiable Data Breach Scheme

The WhiteWolves Creative Network is subject to the Privacy Act and the Notifiable Data Breach scheme. In the event of a data breach that meets the scheme's eligibility requirements, the network will provide notification to the Office of the Australian Information Commissioner and affected individuals.

An eligible data breach occurs when:

- There is unauthorised access to or unauthorised disclosure of personal information, or a loss of personal information

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- This is likely to result in serious harm to one or more individuals
- The network has not been able to prevent the likely risk of serious harm with remedial action

5. Responsibilities

Role	Responsibility
Head of Studio Operations	Overall approval, oversight, and implementation of privacy policy across all studios. Primary contact for privacy matters and ASIC compliance.
Studio Leadership Teams	Support implementation of privacy practices within their respective studios. Ensure team members comply with privacy obligations. Report privacy concerns to Head of Studio Operations.
All Team Members and Collaborators	Comply with this policy. Handle personal information in accordance with privacy principles. Report any privacy concerns or breaches immediately. Respect subscriber and community member privacy in all communications.
Community Members and Subscribers	Notify the network of any changes to personal information. Respect other community members' privacy. Report privacy concerns. Participate responsibly in community spaces.

6. Compliance and Consequences

All individuals associated with the WhiteWolves Creative Network must comply with this Privacy Policy and applicable privacy legislation. Breaches of privacy obligations may result in:

- Internal investigation and disciplinary action
- Suspension or termination of involvement with the network
- Referral to appropriate regulatory authorities
- Legal action where applicable
- Penalties under the Privacy Act 1988 (Cth)

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7. Exceptions

The following exceptions to privacy obligations may apply:

- Where required by law or court order
- Where necessary to prevent or lessen a serious threat to life, health, or safety
- Where required as part of mandatory reporting obligations
- Where necessary in legal proceedings or enforcement activities
- Where the individual has provided explicit written consent

Any exception must be documented and reported to the Head of Studio Operations.

8. Related Documents

- WWGS-POL-SEC-001: Information Security Governance Framework
- WWGS-PRO-DNS-001: DNS Management Procedure
- WWGS-FW-LNG-001: Unified Language and Communication Standards Framework
- Data Breach Response Plan (as referenced in Notifiable Data Breach Scheme section)
- ASIC Business Name Registration Certificate (ABN 74 519 655 814)

9. Review Schedule

This document is subject to review every 12 months from the date of issue, or earlier if operational requirements change, relevant legislation is amended, or a significant incident occurs. The Head of Studio Operations is responsible for initiating review and ensuring updates reflect current practices across all studios.