

Privacy Policy of Ashfield Catholic and Community Club Ltd trading as Club Ashfield

This Privacy Policy explains how Club Ashfield collect, use, disclose, deal with, hold and protect your “personal information”. This is done in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles.

“Personal information” is information that identifies you or from which you may be reasonably identified. Personal information has been given a meaning under the Privacy Act, as *“information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.”*

What kinds of personal information does Club Ashfield collect and hold.

Club Ashfield collect and hold a wide range of personal information, this may include:

- Your personal details, including your full name, residential address, email address, other contact details, date of birth and occupation.
- Your signature.
- Information related to your entry to the Club’s premises.
- A photo of you for your membership card.
- A copy of your “face print” derived from images or video of you, to assist the Club to identify individuals who have been suspended, banned or self-excluded from the Club’s premises, and any metadata associated with the Club’s use of facial recognition technology.
- Required Information from your driver’s licence or other identification when joining or if you choose to scan your ID when entering the Club.
- Information relating to goods and services you buy or receive from the Club.
- Health information, including any medical conditions you may disclose to us to enable us to provide goods or services to you.
- The name and contact details of your next of kin (employees only).
- Information connected to your use of gaming machines (including your player activity statement and prizes you receive).
- Information relating to liquor or gaming Self-Exclusion.
- Bank account details and credit card details.
- Information about your use of the Club Ashfield website and social media pages, including your ISP and any information collected by cookies as a result of your use of our website and social media pages.
- Images or video of you at the Club’s premises or our venues, including images of you collected by our designated security cameras which use facial recognition technology.
- Information related to your use of our WIFI from any of your personal devices.
- Images or videos of you at the Club’s premises via CCTV.
- Information collected as part of AML-CTF legislation.
- If you apply for a job with Club Ashfield, the information in your resume and other information that you or your referees provide to us and notes of our interactions with you and others in relation to your prospective employment.
- From time to time, Club Ashfield may collect additional information about you related to surveys, promotion and particular services or activities at Club Ashfield.

How does Club Ashfield collect your personal information.

Your personal information is collected as a result of your visits to, or dealing with, the Club. Information is collected by recording information that you provide to us, by electronic means, and by the observation of our staff. Club Ashfield collects personal information from you during the following interactions:

- Enter, visit or deal with the Club.
- Apply for or renew your membership of the Club or request to use our services.
- Hold a function at the Club or attend a function.
- Use your membership card or other issued cards at or in connection with the Club.
- Purchase goods or services from us.
- Use our gaming machines or request to be excluded from using our gaming machines.
- Access or use our WIFI from any of your personal devices.
- Participate in activities offered by the Club, including competitions and promotions.
- Visit the Club Website or social media pages operated by the Club.
- Enter into a liquor self-exclusion agreement with us, or otherwise participate in a liquor self-exclusion program and nominate to exclude yourself from all or part of our premises.
- Are suspended, banned or removed from any part of the Club's premises.
- Receive or request a donation from the Club, through programs such as ClubGRANTS.
- Overall, if you have contacted Club Ashfield, we may keep a record of that correspondence.
- We may also receive information about you relating to gaming self-exclusion.

Club Ashfield is required by law to collect personal information.

As a registered club, we have a legal responsibility to collect certain information about our members and guests pursuant to legislation, this includes the *Registered Clubs Act 1976*, *Corporations Act 2001*, *Gaming Machine Act 2001*, *Liquor Act 2007*, *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* and *Work Health and Safety Act 2011*.

For example, as part of the requirements of Anti-Money Laundering and Counter-Terrorism Financing requirements, the Club must "know your customer" for certain transaction, therefore the Club will need to collect certain information and verify your identity using recognised forms of identification (such as a driver's licence or passport).

Another example, as a temporary member, guest of members and other visitors to the Club are required to produce a recognised form of identification (such as a driver's licence or passport) to enter the Club's Licenced premises. If you elect to use our electronic ID scanner, we will collect the required information from your ID at the time you enter the Club.

For what purposes does the Club collect, hold, use and disclose your personal information?

Club Ashfield collects, holds, uses and discloses your personal information to operate the Club, carry out certain activities, provide products and services to you, other members and guests and other members of the public and to comply with our legal obligations. The purpose of collecting your personal information is to undertake one or more of the following activities or functions:

- Assess an application for employment.
- Maintain sign-in registers and display certain information required under the Registered Clubs Act.
- Consider membership applications and renewals.
- Identify patrons when entering the venue and to verify that details are correct.
- Identify individuals who have been suspended, banned or self-excluded from the Club's premises.
- Provide WIFI at the Club.
- Holding a function or attending a function at the Club.
- Any legal and administrative requirements.
- For the running of marketing, competitions and promotions.
- During the use of gaming operations.
- Any direct marketing either through mail or email.
- During the process of Club elections.

Do I have to give my personal information to the Club?

If you refuse to give the Club your personal information, you will not be able to become a member or use the facilities of the Club. In most circumstances, the Club is required to verify your personal information by law.

How does Club Ashfield use personal information?

As mentioned above, the Club uses your personal information to carry out the day-to-day functions of running a Registered Club. If the Club is required to use your personal information, it will do so under the guidelines of the Privacy Act.

The Club may also use the personal information we collect from you for direct marketing purposes; this may be via third parties. Some of the direct marketing may include newsletters, competitions, members announcements.

The Club in some circumstances will be required to use your personal information for secondary purposes, if this is necessary the Club will be doing this under the guidelines of the Privacy Act. An example of a secondary purpose would be if a patron wanting to complete a multi venue self-exclusion, the information collected could be used to inform other venues nominated in the self-exclusion deed.

Club Ashfield may also use the personal information we verify with you for direct marketing purposes, including from third parties. Such purposes may include newsletters, competitions, campaigns, or information about entertainment. You can refuse any direct marketing by contacting the Club.

Does the Club disclose my personal information to others?

Club Ashfield may need to disclose your personal information to third parties that we engage to provide services to or in connection with the Club, including our insurers, ClubsNSW, our legal or financial advisers and other members of the Club.

Your personal information will only be disclosed to third parties for a purpose permitted by the Privacy Act and this policy.

A third-party service provider will only receive your personal information from the Club where that information is necessary for that third party to provide services to or in connection with the Club and

the Club will always require that the third party comply with the Privacy Act when dealing with your personal information.

Club Ashfield may also be required to disclose your personal information if we are required or authorised to do so by legislation/law. This could include law enforcement agencies, the Office of the Australian Information Commissioner, The Australian Electoral Commission, the Department of Family and Community Services and the Australian Taxation Office.

Surveillance at Club Ashfield

Club Ashfield uses video surveillance for security reasons, including to monitor the safety of members, guest and employees and to protect the Club's assets.

Footage may be used in disciplinary proceedings and/or to investigate incidents and may be disclosed to our legal representatives, insurers or law enforcement.

For Club Ashfield employees, please refer to the Workplace surveillance policy.

Club Ashfield also has CCTV surveillance on the Courtesy Bus.

Electronic ID scanner at Club Ashfield

The electronic ID scanner is used to scan a full copy of your identification; there are two main purposes for scanning your identification:

1. Scan your identification to enter the Club.

Under the Registered Clubs Act, we are required to maintain a register of the name, address and signature of temporary members and guests over the age of 18 who enter the Club's premises. This information must be retained by the Club for at least three years. To comply with this requirement Club Ashfield scans a full copy of your ID. The Club will use the scanned ID and collect the required information for our register and then the scanned ID is deleted. Scanning your identification upon entry to Club Ashfield is not an obligation. If you prefer, you can manually enter your name, address and signature (as required by the Registered Clubs Act) into the terminal and present your identification to staff who will confirm your details. Club Ashfield permanently deletes the full copy of your ID that it collects after staff have verified that the information collected is correct.

2. Becoming a member of Club Ashfield

Under the Anti-Money Laundering and Counter-Terrorism Financing Act, the club is required to "Know your customer". This requires the Club to identify new members prior to them becoming members of the Club. To comply with this requirement Club Ashfield scans a full copy of your ID. The Club will use the scanned ID and collect the required information to join the club and then the scanned ID will be deleted. Scanning your identification to become a member is not an obligation but your ID will need to be verified prior to joining.

Storage and protection of your personal information at Club Ashfield

Personal information that is held by Club Ashfield is stored electronically and in hard copy.

Club Ashfield takes reasonable steps to ensure that your personal information is safe and secure from unauthorised access, use or disclosure.

Information that we store electronically is held in secure and password protected databases.

Video surveillance is stored on our server, which is located in a restricted access area and is password protected.

Once your personal information is no longer needed it will be securely destroyed.

Data breach of Personal Information

The Club has various measures in place to protect personal information from misuse, interference and loss and from unauthorised access, modification or disclosure.

In the unlikely event that Club Ashfield has been compromised and your information is the subject of a data breach, the Club would comply with procedures set out in our data breach policy which is based on the aspects found in the Privacy Act.

Further information

If you require further information regarding our privacy policy, please contact our administration office.