

Privacy Policy

1. Purpose

We respect your privacy and follow all laws that protect your personal information, including the Privacy Act 1988 (Cth) and the Australian Privacy Principles.

This policy explains what information we collect, why we collect it, how we use it, and how we keep it safe.

2. Our Commitment

We are committed to complying with our obligations under all relevant legislation, including:

- Privacy Act 1988 (Cth) (Privacy Act) by protecting the privacy and confidentiality of your personal information.
- Gaming Machine (Facial Recognition Technology) and Other Legislation Amendment Regulation 2025
- When we collect, use, disclose, store, access or correct your personal information, our actions will comply with the Privacy Act and the Australian Privacy Principles.

When we collect, use, disclose, store, access or correct your personal information, our actions will comply with the Privacy Act and the Australian Privacy Principles.

3. Personal information collected

The Club may collect personal details when you interact with the Club. This may include:

- Your name, address, email, date of birth, contact details and signature.
- A photo for your membership card.
- ID details if you scan your licence or other ID at entry (optional).
- Information about your visits, purchases, and activities at the Club, including social or sporting activities.
- Health details you share with us for services or safety.
- Next of kin contact details.
- Gaming activity, prizes, and player statements.
- Facial recognition data to help identify people who are self-excluded.
- Images or video from security cameras.
- Bank or credit card details for payments.
- Employment application details.
- Information in connection with an incident or disciplinary proceedings at or in connection with the Club;
- information related to your use of the Club's Wi-Fi;

Self-Excluded persons: Information about you may be shared from or to other clubs and industry bodies if you have excluded yourself from the Club's premises (including in relation to ClubNSW's "ClubSAFE" self-exclusion system).

In general, if you contact us, we may keep a record of that correspondence. We only collect personal information about you from you, unless it is unreasonable or impractical to do so.

4. Why We Collect Personal Information

We collect information so we can:

- Manage your membership.
- Make sure only eligible people enter the Club or use our facilities.
- Keep everyone safe.
- Provide services like dining, events, gaming, Wi-Fi, and entertainment.
- Run competitions and promotions.
- Meet legal requirements under laws like the Registered Clubs Act or Gaming Machines Act.
- Handle complaints, incidents, and disciplinary matters.
- Improve our services.
- Provide access to Wi-Fi
- Provide sponsorships or donations

5. How do we use personal information

The Club uses personal information primarily to carry out its activities and functions. We also use personal information for secondary purposes related to those activities and functions, or when permitted under the Privacy Act.

- The Club may use the personal information collected for direct marketing of products and services, including from third parties. Such products and services may include the provision of newsletters, competitions, announcements, campaigns or information about shows and entertainment at the Club or services offered by the Club.
- From time to time, the Club may collect additional information related to surveys, promotions and particular services or activities at or in connection with the Club. Wherever practicable, we will advise of the information being collected and provide an opportunity to refuse its collection.

6. Use of Facial Recognition Technology (FRT)

The Club uses facial recognition technology (FRT). An individual's facial "imprint" will be captured at the club's front and rear entrances and assessed against the excluded persons database.

- **Purpose of Use:**
 - FRT will be used solely for identifying excluded persons to prevent them from entering or remaining in the licensed premises or gaming machine areas in violation of self-exclusion orders or exclusion directions.
 - The system will delete biometric information that does not identify an excluded person.

- **Response to a positive match**
 - Not all matches will be accurate. Should an individual be identified as a match, a staff member will discreetly discuss the match to verify, and
 - If verified, the club will ensure the individual does not access the gaming area or is removed, depending on the exclusion requirements.

- **Signage**

The club will ensure Liquor & Gaming NSW-approved signage is placed anywhere biometric Facial recognition Technology (FRT) may be used.

 - The Club will display signs stating that a facial recognition technology system is in operation.
 - Signs will be placed in conspicuous positions at each entrance to the club and gaming areas.
 - If an ID scanner is in use, signage will be displayed in close proximity to the ID scanner.

When installing and maintaining the Facial Recognition Technology (FRT) System, the Club will:

- **Ensure Provider Compliance:**
 - Providers must meet technical, legislative and operational standards, including data encryption, secure storage, and system performance benchmarks.

- **System Performance and Integrity:**
 - FRT meets performance standards, including low false negative and false positive identification rates.
 - The Club will conduct regular system performance tests and provide reports to Liquor & Gaming NSW upon request.
 - Maintain system uptime of 99.9% or better during trading hours and plan maintenance outside trading hours.
 - Implement mechanisms for logging system usage and addressing complaints.

- **Data Storage:**
 - Store patron data exclusively in Australia, with encryption and firewall protection.

- Maintain separate data storage for excluded patrons and delete expired or revoked exclusion data promptly.
- Implement data backup and recovery measures.
- **Data Access and Use:**
 - Restrict access to FRT data to authorised staff with documented control processes.
 - Use FRT solely for enforcing gambling-related exclusions and other regulatory obligations.

7. Disclosure of personal information to third parties

We may share your personal information with trusted third parties who help us provide services to you or support the Club's operations. These may include:

- Our related entities, insurers, and sponsors.
- ClubsNSW and other industry bodies.
- Legal and financial advisers.
- Other Club members where necessary.

We only share your information:

- For purposes allowed by law.
- When it is necessary for the third party to provide services to the Club.
- After obtaining your consent, where required.

Examples of services provided by third parties include:

- Sending marketing messages (email or SMS).
- Managing mail services.
- Providing IT systems and secure data storage.

All third parties must comply with the **Privacy Act** when handling your information.

We may also disclose your information if required or authorised by law, including to:

- Law enforcement agencies.
- The Office of the Australian Information Commissioner.
- The Australian Electoral Commission.
- The Department of Family and Community Services.
- The Australian Taxation Office.

Self-Exclusion:

If you have chosen to self-exclude from the Club and nominated other clubs, we may share your details with those clubs to help them comply with your self-exclusion request.

8. Your Rights

You have the right to:

- Ask for a copy of your personal information.
- Request corrections if something is wrong.
- opt out of direct marketing.
- Make a complaint to our Privacy Officer or the Office of the Australian Information Commissioner.

9. How We Protect Personal Information

We use secure systems and processes to protect your information. Only authorised staff and service providers can access it.

We will not share your information unless:

- You agree.
- It's required by law.
- It's needed to provide services (e.g., IT support, mail services).

Additional measures

- Privacy Impact Assessment (PIA) in relation to using biometric systems such as facial recognition technology.
- Response plan in collaboration with the FRT provider.
- Compliance with the Privacy Act 1988 (Cth) and Australian Privacy Principles (APPs)
- Obtaining express consent from excluded patrons for biometric (FRT) data collection.

10. Legal requirements to collect personal information

Federal and State legislation require mandatory collection of personal information in order for a Registered Club to provide the services and facilities to you.

This includes:

- Registered Clubs Act 1976 ;
- Corporations Act 2001 (Corporations Act);
- Gaming Machines Act 2001;
- Liquor Act 2007;
- Anti-Money Laundering and Counter-Terrorism Financing Act 2006; and
- Work Health and Safety Act 2011.
- Code of Practice: Facial Recognition in Hotels and Clubs (NSW)

11. Variations

The club reserves the right to vary or replace this procedure from time to time and in accordance with regulatory changes in legislation or at the club's discretion.

12. Further Information

Legislation	<ul style="list-style-type: none">• Privacy Act 1988 (Cth)• Registered Clubs Act 1976 ;• Corporations Act 2001 (Corporations Act);• Gaming Machines Act 2001;• Liquor Act 2007;• Anti-Money Laundering and Counter-Terrorism Financing Act 2006; and• Work Health and Safety Act 2011.• Code of Practice: Facial Recognition in Hotels and Clubs (NSW)
Related Policies	<ul style="list-style-type: none">• Code of Conduct• AML-CTF Policy• Gaming Plan of Management
Supporting Documents / Information	<ul style="list-style-type: none">• Self-Exclusion• AML-CTF Program

13. Approval & Review Details

APPROVED BY:	General Manager	DATE:	28-04-2026
1. REVIEW DATE:			