

Club Cowra Privacy Policy

Created 21/7/26

Purpose & Scope

Cowra Services Club Ltd, operate as Club Cowra (“we”, “us” or “the Club”).

We are committed to protecting the privacy of all individuals whose personal information we handle. When we collect, use, store and disclose personal information, we will comply with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs).

Our practices also reflect our obligations as a registered club and reporting entity under the Registered Clubs Act 1976 (NSW), liquor and gaming laws, Corporations Act, Work Health and Safety Act and Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) legislation.

Types of personal information collected

We may collect personal information such as:

Identity and contact information: your full name, date of birth, address, email, phone, signature and gender.

Membership information: your membership number, class of membership, join date, visit history, positions held by you at the Club and any complaints made against you.

Information about use of our products and services: information about goods or services you buy or receive from the Club and your participation in social, sporting or other organised activities, including payment history, even bookings, member card transactions, POS transactions and your use of our loyalty program.

Visitor information: information about your visits to our premises and, if you are a temporary member, a temporary scanned image of your drivers licence or other ID, from which we extract your name, address, date of birth, signature and photograph to maintain our registers.

Gaming transactions and information: information about your use of our gaming machines, Keno and TAB (including prizes, payouts and jackpots), player activity statements, your ID number (in certain circumstances) and other information we are required to collect to comply with our AML/CTF obligations (including your occupation, political associations and the source of your funds).

Exclusion information: whether you have self-excluded yourself or been excluded by a third party from using our gaming machines and information about you related to a liquor self-exclusion, banning order or liquor accord.

Images of you: CCTV footage of you at our premises, a photo of you for your membership card and photos of you and others participating in our activities, functions and events.

Facial recognition data: biometric information and templates, including any metadata associated with our use of facial recognition technology.

Incidents at the Club: things you say and do, or things said about you, in connection with an incident or disciplinary proceedings at or in connection with the Club.

Vehicle identifiers: Number plate recognition may be utilised for parking access and security.

Digital interactions: information about your use of our websites, social media pages and Wi-Fi collected by website analytics, cookies/pixels and device identifiers.

Financial Information: payment details required for us to process a gaming machine payout to you via EFT.

Employment & volunteers: recruitment information including information from your resume and referees, onboarding records, training, compliance data, police checks, health information, bank account and superannuation fund details and tax file numbers (note: certain employee records are handled in accordance with the employee records exemption in the Privacy Act).

Anonymity and Pseudonymity

If you don't give us your personal information, you may not be able to become a member of our club, use our services or facilities, or access our premises.

In most circumstances, you will be unable to deal with us anonymously or with a pseudonym because of our obligations under the Registered Clubs Act.

How we collect personal information

We collect information by recording information in hardcopy and by electronic and automated means. We collect information:

Directly from you: when you:

- enter, visit or deal with us and our venues;
- apply for, or renew, your membership with us;
- fail to make a payment you are required to make to us;
- use your membership card;
- purchase goods or services from us or participate in activities, competitions and promotions we offer;
- plan or attend a function, event or show at a venue we operate;

- use our gaming machines;
- are excluded, suspended, banned or removed from any part of our premises;
- make a complaint or are involved in, witness or are connected to an incident or disciplinary proceedings at or in connection with the Club;
- apply for and/or receive sponsorship through ClubGRANTS;
- visit one of our websites or social media pages;
- make an enquiry with us and interact with our staff; and/or
- apply for a job with us.

Systems and devices: via our electronic ID scanners, point-of-sale systems, booking software, access control systems, gaming management systems, CCTV and facial recognition technology systems, website analytic tools and cookies/pixels. Several of these systems involve forms of automated decision making.

From third parties: service providers (e.g., payment processors and ticketing providers), regulators, law enforcement, payment processors, gaming partners (Keno/TAB), your family and industry bodies (if you are subject to a third-party gaming exclusion or a multivenue exclusion (such as BetSafe).

In general, if you contact us, we may keep a record of that correspondence.

Wherever practicable, we will notify you of the information being collected about you and provide you with an opportunity to refuse the collection of your information.

If you give us personal information about others, we expect that you will tell them about this policy.

Purpose of handling personal information

We collect, hold, use and disclose personal information to perform the following activities or functions:

- Consider applications and renewals of membership.
- Identify who comes to our premises: identify individuals who are suspended, banned or excluded from our premises.
- Provide a safe environment for you, other members and guests and staff.
- Provide goods and services and hold events and activities at the Club.
- Operate our rewards program.
- Improve our goods and services and improve the functionality of our websites.
- Maintain registers and comply with our legal, regulatory and accounting obligations, including our gaming, liquor, registered clubs' governance and AML/CTF obligations.
- Conduct gaming operations and responsible gambling and harm-minimisation activities.

- Carry out marketing, competitions and promotions (including direct marketing).
- Carry out administrative activities and functions.
- Offer and manage sponsorships of community sports clubs and other organisations.
- Operate our sub-clubs, including publishing contact details of committee members.
- Resolve complaints and investigate incidents or conduct disciplinary proceedings.
- Assess a job applicant's suitability for employment.
- Conduct elections of our Board and send notices of annual general meetings and other communications to members.
- Promote the objects of the Club and maintain a social record of the community.

Disclosure of Personal Information

We may need to disclose your personal information to our third-party service providers, our insurers, exclusion program operators, Clubs NSW, our legal and financial advisers and other members of the Club.

Your personal information will only be disclosed for a purpose permitted by the Privacy Act and/or this policy and, where required, after obtaining your consent.

We will also disclose your personal information to law enforcement agencies and government bodies if we are required or authorised to do so by law, including AUSTRAC, the Department of Communities and Justice and the Australian Taxation Office.

Overseas disclosure

We do not ordinarily disclose personal information overseas but if you agree to information being put on our websites or social media pages, then this could be accessed by people in other countries.

Our membership database is stored on our primary servers, which are located at our premises. Our physical records are also located in Australia.

Where we use third party providers located overseas, or disclose data to partners outside Australia, we will take reasonable steps to ensure that the recipient will comply with the Australian Privacy Principles, unless we reasonably believe that the recipient is subject to laws which requires them to handle personal information in a substantially similar way to the APPs.

Direct Marketing

We may use your personal information to send you information about products and services, including information from third parties. This may include newsletters, information about events, promotions and partner offers.

You can opt out of direct marketing at any time by contacting us (Section “How to contact us”) or by clicking unsubscribe in our emails.

CCTV and Surveillance

All our venues are subject to CCTV surveillance for security reasons, including to monitor the safety of members, guests and employees and to protect our assets. We may use CCTV footage to investigate incidents and in disciplinary proceedings.

Access to footage is restricted but we may disclose footage to law enforcement agencies, regulatory authorities, our insurers and our legal representatives where required. CCTV recordings are retained for a minimum period of 30 days and are destroyed when they are no longer needed.

Facial Recognition

We use facial recognition technology at our premises to enhance our security procedures and assist us to identify and remove persons who have been suspended, banned or self-excluded from all or part of our premises. We do not use your “face print” for any other purposes (such as marketing or profiling).

If you enter our venues, designated security camera will capture an image of your face, analyse your biometric information from that image and create a “face print”. A “face print” is a mathematical representation of your biometric information, which is used to uniquely identify an individual.

This “face print” will then be compared against a database of individuals who have been suspended, banned or self-excluded from the Club.

If your “face print” matches that the “face print” of an individual on our database, our staff will be alerted. Steps will then be taken to manually verify your identity and if necessary, to remove you from our premises or the relevant area in the premises.

If your “face print” does not match the “face print” of an individual who has been suspended, banned or self-excluded from part or all of the Club’s premises, your “face print” will be immediately deleted (within seconds).

For the purposes of enabling the “face print” matching referred to above, if an individual has been suspended, banned or self-excluded from our premises, we will collect a copy of that individual’s “face print” from an image of that individual (e.g. from CCTV or

photograph) and store it in a separate, secure database. That database can only be accessed by authorised staff.

We will delete an individual's image and "face print" from our database of suspended, banned and excluded persons once their suspension, ban or exclusion comes to an end.

We will not store your "face print" unless you have been suspended, banned or self-excluded from all or part of our premises.

Websites, cookies and analytics

Our websites and social media pages may use cookies, tags and pixels to operate the site, measure usage, and personalise content/ads. We will handle any information collected as a result of your use of our websites in accordance with this policy.

You can manage cookies via browser settings, but some features of our websites may not function without them.

Our websites may also contain hyperlinks to websites operated by third parties. Any hyperlinks are provided for reference only and we are not responsible for their content of third-party websites or the privacy practices of those third parties.

There will also be instances when dealing with our websites where you will be redirected to a third party's website or platform. For example, you will be redirected to a third-party payment platform to make an online payment to us.

Generally, we do not have control over these third-party providers and how they collect and handle personal information that you provide to them. We also typically have limited access to the information they collect and hold. We do not accept any liability for the actions of any such third-party providers and strongly encourage you to read their privacy policies.

Mobile Application

Collection of Personal Information via Our App

When you use our mobile application (Club Cowra), we may collect personal information to provide and improve our services. The type of information collected depends on how you use the App and may include:

- Your name, contact details (such as email address and phone number)
- Membership details (including member number and membership status)
- Login credentials and account preferences
- Transaction and interaction information (for example, bookings, promotions, or offers accessed through the App)

- Device and technical information, such as device type, operating system, app version, IP address, and usage data
- Location data, where you enable location services [for example, to provide location-based features or notifications]

We only collect personal information through the App that is reasonably necessary for our business functions or activities or where required or authorised by law.

How We Use Information Collected via the App

Personal information collected through the Club Cowra App may be used to:

- Provide, operate and manage App features and services
- Verify your identity and membership status
- Communicate with you about your account, bookings, offers, events or updates
- Send notifications, alerts or marketing communications (where you have consented or where permitted by law)
- Improve the App's functionality, performance, and user experience
- Meet our legal, regulatory, and compliance obligations

Push Notifications and App Communications

The Club Cowra App may send push notifications to your device, such as reminders, updates, promotions, or operational messages. You can manage or disable push notifications at any time through your device settings.

Location Service Data

The App, 'Club Cowra' available on the Apple & Google Play Store, collects location data to reward patrons for using our services even when the app is closed or not in use.

A Member or guest may turn location services off in their settings if they wish to opt out of this feature of the app.

In-App Analytics and Performance Monitoring

We may use analytics and diagnostic tools within the App to understand how users interact with it, identify technical issues, and improve functionality. This information is generally collected in an aggregated or de-identified form, where practicable.

Third-Party Service Providers

We may disclose personal information collected via the App to third-party service providers who assist us with app hosting, analytics, communications, customer support, or other operational services. These providers are required to handle personal information in accordance with privacy laws and use it only for authorised purposes.

Some service providers may store or process information overseas. Where this occurs, we take reasonable steps to ensure that overseas recipients handle personal information consistently with Australian privacy requirements.

Managing Your Information

You can access, update, or correct certain personal information through the App or by contacting us using the details set out in this Privacy Policy. You may also request access to, or correction of, personal information we hold about you in accordance with applicable privacy laws.

App Security

We take reasonable steps to protect personal information collected through the App from misuse, interference, loss, unauthorised access, modification, or disclosure. No method of electronic transmission or storage is completely secure, and users acknowledge this when using the App.

Notifiable Data Breaches

If our security measures are compromised, we will comply with our obligations for responding to data breaches under the Privacy Act.

As soon as we become aware of a data breach, we will take urgent steps to contain the breach, mitigate any risk of harm and determine who may have been affected by the breach. We will then assess the breach and determine whether the breach is likely to result in serious harm to any person whose data was involved.

If we have reasonable grounds to believe that the breach is likely to result in serious harm to you, we will notify you of the breach as soon as possible. We will also notify the Office of the Australian Information Commissioner of the breach.

Following a breach, we will conduct a review of our security measures and implement any additional measures we consider necessary to enhance the security of your information.

Data quality and security

We take reasonable steps to ensure personal information we collect, use and disclose is accurate, up-to-date and complete, and that information we hold is protected against misuse, interference, loss, and unauthorised access, modification or disclosure. Those measures include role-based access, multi-factor authentication, encryption, firewalls, use of secure databases, staff training and vendor due diligence. Your personal information is securely destroyed when it is no longer needed or becomes out of date.

Access and Correction

You have a general right to request access to the personal information we hold about you and to request correction if it is inaccurate, incomplete or out of date. We will respond to your request within a reasonable time.

To assist us to comply with your request, we may need you to verify your identity and provide us with evidence of your new details. In some cases, we may be unable to give you access to, or amend, your personal information. If so, we will provide you with written reasons.

Retention and destruction

We retain personal information for as long as it is required for the purposes described in this policy. When it is no longer required, we take reasonable steps to destroy or de-identify personal information.

How to contact us

You can contact our General Manager as follows:

General Manager: Sharlene McLeish

Email: info@cowrasclub.com.au

Address: 101 Brisbane St Cowra

Phone: 0263421144

Complaints

If you believe we have breached the Australian Privacy Principles, please contact our Privacy Officer. We will acknowledge receipt of your complaint and investigate. When contacting our Privacy Officer, please give us enough details to be able to identify you, understand your issue or complaint and respond appropriately.

If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner (OAIC). Please see the OAIC's website for contact details: <https://www.oaic.gov.au/about-us/contact-us/>.

Changes to this policy

We may update or revise this policy at any time to reflect operational changes or changes in our legal obligations.