

PRIVACY POLICY

Toukley R S L Sub-Branch Club Ltd (ACN 000 990 269) (**The Ary, Club, we, us, our**) is a registered club under the *Registered Clubs Act 1976* (NSW) (**Registered Clubs Act**) and a company limited by guarantee incorporated under the *Corporations Act 2001* (Cth) (**Corporations Act**).

A core value of the Club is to properly value and protect any information entrusted to us about our customers. This privacy policy describes how the Club safeguards personal information in accordance with our legal obligations, to ensure peace of mind when dealing with our Club. Members, guests, and other persons entering the Club's premises or interacting with the Club in any way should read this policy.

PURPOSE

This policy sets out how the Club complies with the *Privacy Act 1998* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APP**), which regulate how APP entities must manage personal information, and to protect your personal information, which we take very seriously.

'Personal information' is essentially information or an opinion about an identified or reasonably identifiable individual, whether the information or opinion is true or not, and whether the information or opinion is recorded in material form or not.

By visiting our website (<https://www.thearytoukley.com.au/>) (**Website**), attending our premises, using our goods and/or services or by otherwise providing your personal information to us, you consent to us handling your personal information in accordance with this policy. If you do not agree with the terms of this policy, please do not attend our premises, use our products, services, Website or otherwise provide us with your personal information.

WHAT KINDS OF PERSONAL INFORMATION DOES THE CLUB COLLECT AND HOLD?

We collect a wide range of personal information, and in some cases sensitive information, which includes:

- Your name and address (including street, postal and email address), and phone number;
- A photo of you;
- Your occupation, date of birth and signature;
- An image of your driver's licence or other identification if you choose to scan your ID when entering the Club (all visitors to the Club have the option not to have their identification scanned);
- Your biometric information including your faceprint (through use of facial recognition technology);
- Details of your membership of the Club including any positions held by you at the Club or any complaints made by you or against you;
- Information about what goods or services you buy or receive from us including whenever you use your membership card;
- Details of your activities in the Club including your participation in social or sporting activities or your involvement with our sub-clubs;

- Health information including any medical conditions you may give to us to enable us to provide our facilities or services;
- Information connected to your use of our gaming machines (including your player activity statements and prizes you receive);
- Information connected to your participation in the Club's rewards loyalty program;
- Information about you related to a liquor or gaming self-exclusion or banning order about you from yourself, other clubs, ClubsNSW, a Liquor Accord or the Independent Liquor and Gaming Authority;
- Things you say or do (or said about you) in connection with an incident or potential disciplinary proceedings;
- Your IP address and pages accessed on our website;
- Images or video and audio recording of you at our premises; and
- If you apply for a job with us, the information in your resume and other information that you or your referees provide to us, including notes of our interactions with you and/or others in relation to your prospective employment.

From time to time, we may collect additional information related to surveys, specific promotions, services or activities. Wherever practicable, we will advise you of the information being collected and provide you with an opportunity to refuse the collection of information.

HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

We only collect personal information about you from you unless it is unreasonable or impractical to do so. We collect personal information by means including, but not limited to, when you:

- Visit the Club;
- Apply for, or renew, membership of the Club or request to use our services;
- Purchase goods or services from us (and for example, use your membership card);
- Use our gaming machines or request to be excluded from using our gaming machines;
- Attend a function or show at the Club;
- Plan a function to be held at the Club;
- Participate in the activities offered by the Club including raffles, competitions, promotions and rewards loyalty program;
- Visit our website or one of the social media sites used by the Club;
- Are banned or removed from the Club or the gaming area;
- Use your Club membership card or another card issued by the Club in the Club;
- Receive or request sponsorship through programs such as Club Grants;
- Are involved, witness or are connected to an incident at the Club or disciplinary proceedings of the Club; and/or
- Obtain, apply for, or renew membership of a sub-club of the Club or participate in the activities of a sub-club of the Club.

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

Whilst we strive to only collect personal information about you from you, there may be circumstances where it is unreasonable or impractical to do so. For example, it may be unreasonable or impractical to collect information from you when the information is provided by other members, your

representative(s), our staff or the police. We may also collect your personal information from third parties where necessary to comply with our Responsible Conduct of Gaming (**RCG**) and AML/CTF responsibilities. Furthermore, your personal information is collected as a result of your visits to (or dealings with) the Club. Information is collected by recording information that you provide to us, by electronic means and by the observations of our staff.

WILL I BE NOTIFIED THAT MY PERSONAL INFORMATION IS BEING COLLECTED?

When we collect information from you, we will take reasonable steps to notify you (or otherwise ensure that you are aware) of the following:

- Our identity and contact details;
- The facts and circumstances of the collection;
- Details of any law that require or authorise the collection;
- The purposes of collection;
- The consequences if we do not collect the information;
- That this policy contains information about how you can access or correct your information or make a complaint about the Club; and
- Whether we are likely to disclose the information overseas (and if so to which countries).

One way we notify you of the above is by making you aware of this policy.

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

IS THE CLUB 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 including but not limited to the Registered Clubs Act, Corporations Act, *Gaming Machines Act 2001* (NSW), *Liquor Act 2007* (NSW), *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* Cth) and *Work Health and Safety Act 2011* (NSW).

For example, when a person applies for membership of the Club we must collect details including their name and address. We must display this information on the Club's noticeboard before the Board is able to consider the application for membership. We may also need to provide this information to other members if a request is made under the Corporations Act.

Temporary members, guests of members and other visitors to the Club's premises may be required to produce a recognised form of identification (such as a driver's licence or passport) to gain entry into the Club's premises. If you elect to use our electronic ID scanner, we collect information from your ID at the time you enter the Club. More information about our electronic ID scanners appears below.

FOR WHAT PURPOSES DOES THE CLUB COLLECT, HOLD, USE AND DISCLOSE YOUR PERSONAL INFORMATION?

We collect, hold, use and disclose personal information to operate the Club, carry out certain activities, provide products and services to members and guests and other members of the public to comply with our legal obligations. The purpose of collecting personal information is to:

- Consider applications and renewals of membership;
- Identify who comes into the Club's premises and to verify their age, address and other relevant details;
- Comply with our obligations and meet statutory requirements under legislation relating to registered clubs, liquor, gaming, anti-money laundering, and other relevant legislation that may apply to the Club;
- Provide a safe environment for you, other members and guests and our staff;
- Provide goods and services to members and their guests;
- Carry out accounting and finance requirements and legal and administrative reporting requirements;
- Operate functions at the Club;
- Carry out competitions and promotions;
- Perform gaming operations and carry out Responsible Conduct of Gaming (**RCG**) and AML/CTF responsibilities;
- Publish and distribute newsletters;
- Carry out marketing (including direct marketing) including to contact members to advertise and market events, activities, opportunities, offers and the goods and services provided by the Club or companies in which the Club has an ownership interest (including by direct mail, email, telephone, SMS and MMS) including without limitation with respect to food and beverage, promotions, entertainment, wagering, gaming machines, gaming, venue hire and the rewards loyalty program;
- Offer and manage sponsorships including by supporting community sports and social events;
- Operate and support sub-clubs of the Club including publishing contact details of committee members;
- Analyse website and social media usage:
- Conduct elections of the Board;
- Conduct disciplinary proceedings;
- Resolve a complaint;
- Access an applicant's suitability for employment;
- Improve our services and increase membership of the Club; and
- For any other purposes that would reasonably be expected by you.

WHAT HAPPENS IF YOU DON'T PROVIDE YOUR PERSONAL INFORMATION?

If you don't give us your personal information you may not be able to become a member of the Club or use the Club's services or facilities.

You have the option of not identifying yourself or using a pseudonym when dealing with us. However, this will be limited to enquiries of a very general nature and usually only over the telephone or by email, or when you use our website. In most circumstances you will be unable to deal with the Club anonymously or with a pseudonym because of our obligations under applicable legislation.

HOW DO WE USE YOUR PERSONAL INFORMATION

We only use and/or disclose your personal information for the purpose for which it was collected (e.g. for application of club membership or to gain entry to the Club premises as a visitor or guest) or for other purposes as permitted by the Privacy Act or that are set out in this policy or for which you consent. The

Club will otherwise only disclose your personal information (which may include sensitive information) to third parties on the basis that they agree with us to keep your information confidential, or where we are authorised or required by law to disclose the information. These third parties may include, but are not limited to:

- our related companies, companies in which the Club has an ownership interest or our agents;
- employees, third party service and content providers, dealers and agents, contractors and advisors;
- the Club's insurers, industry bodies (including ClubsNSW), a Club sponsor, our legal or financial advisers or to other Club members;
- law enforcement bodies to assist in their functions, courts of law or as otherwise required or authorised by law; and
- regulatory or government bodies for the purposes of resolving customer complaints or conducting investigations.

The Club may also use the personal information we collect from you for direct marketing of products and services to you, and may disclose including from third parties. Such products and services may include the provision of newsletters, competitions, announcements, campaigns or information about entertainment at the Club or services offered by the Club.

You can opt out of any direct marketing by advising the Club. There is certain information that we must send members of the Club, including statutory notices and communications. You cannot opt out of receiving this information.

We may need to disclose your personal information to third parties for the purposes of allowing us to carry out the activities listed above. For example, from time to time, we engage external companies to send direct marketing emails and SMS, carry out mail services, IT storage services and software related services. These external companies only have access to the information necessary to provide services to the Club. They are required to comply with the Privacy Act and must offer privacy standards comparable to those offered by us.

We will disclose your personal information if we are required or authorised to do so by law enforcement agencies, the Australian Electoral Office, the Department of Family Services or the Australian Taxation Office.

FREQUENTLY ASKED QUESTIONS

Is there surveillance at the Club? The Club's premises is subject to video and audio surveillance for security reasons including to monitor the safety of members, guests and employees and to protect our assets. The footage and audio recordings may be used in disciplinary proceedings and/or to investigate incidents and may be disclosed to our legal representatives, our insurers, our clubs and law enforcement agencies and regulatory bodies, as appropriate.

Do I have to use the electronic ID scanner to enter the Club? No. You are not in any way obliged to scan your identification. If you prefer you can simply 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.

What information is collected by the electronic ID scanners? Our electronic scanner used by the Club makes a copy of your ID which means that the Club collects all the information recorded on your ID (which may include sensitive information) except for the card number or licence number. The information collected is retained for thirteen months to comply with our obligations under the Registered Clubs Act.

Our electronic ID scanners store data in a password protected encrypted database.

Why does the Club use ID scanners? Under the Registered Clubs Act, we are required to maintain records of the name, address and signature of temporary members and guests over the age of 18. Previously, we provided paper registers that needed to be filled out by hand which was slow, cumbersome and wasted paper.

The Club now offers scanning terminals which are quicker and more efficient for temporary members and guests who want to enjoy Club facilities but do not want to manually write in their details.

ID scanners are a secure way of holding information and also help provide a safe environment for you, other patrons and our staff. The information collected may be passed onto the police or Independent Liquor & Gaming Authority to assist in any investigation. The collection of personal and sensitive information of the individuals who choose to scan their identification is reasonably necessary for the activities and functions of the Club.

ID scanners are environmentally friendly and have helped the Club reduce paper usage and storage.

Does the Club use facial recognition technology? The Club uses facial recognition technology at our premises to bolster our security systems and assist us with authenticating and verifying customer identities in a secure manner to prevent persons that are suspended, banned or self-excluded from gaining entry, and to otherwise identify persons of interest (including persons notified by the Police to the Club).

There are designated security cameras throughout our premises which use facial recognition technology to collect and analyse 'faceprints' of selected individuals. A faceprint is a digitally recorded representation of an individual's face based on the location, size and shape of an individual's facial features. The Club has placed prominent signs in locations where the Club's designated security cameras use facial recognition technology.

By entering the Club's premises, you consent to the Club collecting your digital image and checking that image against a database of self-excluded people. If you do not agree to the Club's use of facial recognition technology, then you must not enter the Club's premises.

How do we hold and protect your personal information? Personal information that is held by us is stored both electronically and by hard copy. We take reasonable steps to ensure that your personal information is safe and secure by unauthorised use and disclosure.

Information that is stored electronically or on our servers is restricted, password protected and only accessible to relevant employees.

Video surveillance is stored on our digital recorders which are maintained in a restricted access area and password protected.

We will take reasonable steps to destroy or permanently de-identify your personal information when we no longer require it for any purpose for which it was collected or can be used in accordance with the Privacy Act. We are required by law to keep some types of information for certain periods of time, with personal information stored and archived for a period of seven (7) years. This includes information about non-members and internet site transmission logs. If we no longer require your personal information, we will generally destroy or de-identify it.

Are we likely to disclose personal information overseas? The Club has a third party supplier which assists with collecting digital images collected via FRT; it is likely that this information will be disclosed to an overseas recipient, in which case the Club will take steps to ensure compliance with APPs for any such disclosure. It is unlikely that we will disclose any other of your personal information overseas. However, if you agree to information being put on our websites or social media then this could be accessed by anyone in Australia and by persons in other countries.

Using the Club's website and social media: The website and social media sites operated by us may collect personal information for the purposes outlined in this policy. They may also use cookies.

Any information collected as a result of your use of the website or social media platforms operated by us will be handled in accordance with this policy. The website and social media sites operated by us may contain hyperlinks to other websites including those operated by third parties. The links provided are for reference only. We do not have any control over these external websites. We are not responsible for the content on these sites or the privacy practices adopted by these sites.

What does this policy mean? By attending the Club or participating in an activity with us or accessing our website, you consent to the terms of this policy. From time to time, your additional consent will be sought for the collection, use or disclosure of information for purposes other than as set out in this policy.

If you do not agree to any part of this policy or do not wish to receive direct marketing information, please contact the Club.

The Club reserves the right to make changes to this policy from time to time. We will publish any changes on our website. By continuing to use our products, services and website or by continuing to provide us with your personal information after these changes have been published, you confirm your acceptance of these changes.

How do I access, update or correct the personal information held by the Club about me? You can request the personal information we hold about you by contacting the Club in writing. We will not charge you for making the request. However, we may need to charge you for our time to answer your request. We will advise you in advance if there are to be any charges associated with complying with your request.

We will respond to your request within a reasonable timeframe (usually not more than 30 days). When you request access, we may need further information from you to verify your identity (such as supporting documentation from a government source).

The Club will provide you access to your information except where the Privacy Act prohibits it or if there are exceptions under law where we may refuse your request for access. If you believe that the personal information that we hold about you is incorrect or out-of-date, please advise us in writing by sending your letter or email to the Privacy Officer using the details below and informing us of the correct information. If asked to correct your personal information we will take reasonable steps to correct the information to ensure that it is accurate, up to date, relevant and not misleading. If we refuse to correct your personal information, we will give you written reasons.

MAKING A COMPLAINT

If you believe we have breached the Privacy Act or any of the APPs or if you want to raise any issues you may have about the Club's handling of your personal information, please contact the Chief Executive Officer (who is the Club's Privacy Officer).

You can contact the Chief Executive Officer by:

Phone: (02) 4396 4855
Email: privacy@thearytoukley.com.au
Post: PO Box 22, Toukley, NSW 2263

In making a complaint to the Club about privacy, please give us enough details to be able to identify your concerns and respond appropriately. You must provide us with your name and contact details and a description of your complaint. We will respond to you in a reasonable timeframe (usually not more than 30 days). If you are unhappy with how we handle the complaint you have a right to take the complaint to the Information Commissioner.

Office of Australian Information Commissioner contact details:

Phone: 1300 363 992
Email: enquiries@oaic.gov.au
Post: GPO Box 5218 Sydney 2001