

Privacy Policy
Campsie RSL Sub-Branch Club Ltd
ACN 001 044 373



Campsie RSL Sub-Branch Club Ltd ACN 001 044 373 (**Club, Campsie RSL Group, us, we, our**) is a registered club under the *Registered Clubs Act 1976* (NSW) and a company limited by guarantee incorporated under the *Corporations Act 2001* (Cth). We are committed to providing you with the highest levels of customer service. This includes protecting your privacy and keeping you informed of our current privacy policy, which is accessible at: <http://www.campsiersl.com.au/Privacy.aspx>

By visiting our website at www.campsiersl.com.au (**Website**), attending our premises, using our goods and/or services or by otherwise providing your personal information to us, you confirm your acceptance of the terms of this policy and consent to the handling of your personal information as set out in 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.

Purpose

This policy sets out how the Club complies with the *Privacy Act 1988* (Cth) (**Privacy Act**) (including any amendments to the Privacy Act) and the Australian Privacy Principles (**APP**), which regulate how APP entities must manage personal information (as defined in the Privacy Act), and to protect your personal information, which we take very seriously. In particular, we will explain:

- how this policy applies to our members, guests and visitors;
- what kind of information we may collect about you, how we collect it and how we might use the information;
- how we may disclose that information;
- how you can access the information that we hold about you;
- when we might use your information to contact you;
- how we protect your personal information;
- how we might use cookies, if any, to collect information on our Website and other digital platforms, and how you can control or delete these cookies; and
- how and why we collect additional information to improve our services.

Collection

Types of information collected

As a registered club, we collect personal information about you, that is, information that can identify you such as your name, street address, mailing address, email address, phone number, occupation, date of birth, proof of age, photograph, live or recorded CCTV video, payment and bank account details, other contact details and the extent of your use of (and preferences in relation to) products and services offered by, or available at or from the Club, and other information relevant to providing you with the services you are seeking.

How we collect information

We collect your personal information directly from you, unless it is impracticable or unreasonable to do so. This includes, but is not limited to you:

- completing and submitting your membership application or renewal form;
- entering the Club and choosing either to scan your identification document (**ID**) or manually enter your details into the terminal;
- purchasing goods or services from us;
- sharing your health information with us including any medical conditions you may have in order for us to provide our facilities or services to you;
- completing entries into competitions and promotions;
- using our gaming machines or requesting to be excluded from using our gaming machines;
- using our food, beverage, keno and TAB facilities
- obtaining, applying for, or renewing membership of a sub-club of the Club or participating in the activities of a sub-club of the Club;
- otherwise using our facilities or services and being observed by our staff;
- providing witness statements in disciplinary matters;

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- requesting sponsorship through programs such as ClubGRANTS;
- contacting us as part of a complaint or request;
- applying for a job with us;
- using the Website or engaging with a social media page or profile used and managed by the Club;
- providing your bank account details for EFT gaming prize payments; and
- fulfilling Anti-Money Laundering and Counter-Terrorism Financing (**AML/CTF**) requirements where required.

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 or disclose it to third parties where necessary to comply with our Responsible Conduct of Gaming (**RCG**) and AML/CTF responsibilities.

We receive any personal information that you provide to us about third parties on the understanding that the relevant individual has consented to you: providing us with their personal information; and us collecting and handling their personal information in accordance with this policy.

Legal requirement to collect personal information

The Club is required to collect certain information about our members and guests pursuant to state and federal legislation including without limitation the *Registered Clubs Act 1976* (NSW) (**Registered Clubs Act**), *Corporations Act 2001* (Cth) (**Corporations Act**), *Gaming Machines Act 2001* (NSW), *Liquor Act 2007* (NSW), *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) (**AML/CTF Act**), and the *Work Health and Safety Act 2011* (Cth).

For example, when a person applies for membership of the Club, we must collect details including their name and address. We must display the applicant's name on our notice board before the Board is able to consider the application for membership. We may also be required to provide this information to another person if a due request is made under the Corporations Act.

Temporary members, guests of members and other visitors to our licensed premises are required to produce a recognised form of photo identification to gain entry to the venue. Recognised photo identification includes a valid Driver's Licence, Passport and Proof of Age Card (along with proof of a valid Australian residential address if not visible on the photo identification). The information from your ID is collected when signing in. The Club uses a private and secure ID verification service provided by Global Data Pty Ltd (**Global Data**), which verifies your ID using the document verification service (**DVS**) facilitated by the Australian Government. This ID verification process is set out further below under the heading 'Verification of Identity, Visitors and Guests'.

Purpose of collection

The Club collects this personal information in order to:

- consider applications and renewals of membership;
- identify who enters our licensed premises and verify your 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;
- 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, telephone, SMS and MMS) including without limitation with respect to food and beverage, promotions, entertainment, wagering, gaming machines, gaming and venue hire;
- perform gaming operations and carry out Responsible Conduct of Gaming (**RCG**) and AML/CTF responsibilities;
- analyse usage of food and services offered by the Club;

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- provide you with goods or services you are receiving or utilising as offered by the Club and to offer and administer any benefits you subsequently become entitled to in relation to that product or service;
- provide a safe environment for you, other members and guests and our staff;
- conduct elections of the Board;
- conduct disciplinary proceedings;
- share your information with companies in which the Club has an ownership interest for the purpose of them marketing their products to you;
- analyse Website usage;
- respond to your submissions, questions, comments, requests and complaints;
- conduct our internal business and management processes, for example accounting or auditing purposes;
- assess an applicant's suitability for employment; and
- for any other purposes that would reasonably be expected by you.

Use and Disclosure

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.

From time to time, you may be able to visit the Website or deal with us anonymously. However, please be aware that, if you do not provide us with certain personal information that we require, we may not be able to provide you with the products and/or services that you seek.

For example, the Club will be unable to allow you to join the Club or to be a temporary member, unless you have provided us with the required personal information. The Club will also be unable to provide you with certain goods and services or to join a sub-club, unless you have first provided the Club with the required personal information.

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 (except 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, in order to: provide products and/or services to you; or to market to you, their products and/or services which you may be interested in;
- employees, third party service and content providers, dealers and agents, contractors and advisors;
- Global Data, for the purpose of verifying your identity through the DVS process addressed below;
- 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.

You consent to us disclosing your personal information to the third parties listed above, and similar organisations who may in turn provide your information to other third parties. You can withdraw your consent at any time by informing us in writing (except where we are authorised or required by law to disclose the information).

There is certain information that we must send members of the Club, including statutory notices and communications. For example, under the Corporations Act the Club is required to send members entitled to vote a notice of general meeting. You cannot opt out of receiving this information.

Internet Users

If you access our Website we may collect additional personal information about you including your Internet Protocol (IP) address, domain name, type of operating system, type of browser and your general area of location. Also, our Website uses cookies. The main purpose of cookies is to identify users and to prepare

customised web pages. Cookies do not identify you personally, but they may link back to a database record about you. We use cookies to monitor usage of our Website and to create a personal record of when you visit our Website and what pages you view, so that we may serve you more effectively.

Marketing and Promotional Materials

The Club may use your personal information for the purposes of marketing our services and products or to inform you of new services, promotions or events that we believe you may be interested in. For example, from time to time, the Club may wish to carry out a voluntary survey for feedback. Before collecting survey results, the Club will advise you of the purpose of the survey e.g. to gain information for the club to improve services etc.

Verification of Identity, Visitors and Guests

Under the Registered Clubs Act, patrons visiting the Club must produce a recognised form of photo identification to gain entry to the Club's premises. Recognised photo identification includes a valid Driver's Licence, Passport or Proof of Age Card (along with proof of a valid Australian residential address if not visible on the photo identification).

The Club uses a digital sign-in system to gather this information and to protect the data collected (for e.g., the addresses of patrons). To assist with verifying a person's identity privately, securely and quickly, the Club also uses an ID verification service provided by Global Data, which verifies your ID using the Document Verification Service facilitated by the Australian Government.

What is the Document Verification Service (DVS)?

The DVS is a secure system that compares the information on your ID against information provided by third party official record holders, including Registries of Births, Deaths and Marriages in Australian States and Territories, and Austroads which manages the National Exchange of Vehicle and Driver Information System which exchanges information about vehicles and driver's licences across state borders (**relevant official record data**).

How does the ID verification process work?

The ID verification process is as follows:

1. Your ID is scanned, the Club retains a record of the personal information contained in your ID (including your full name, address and date of birth), and the Club deletes the scan of your ID.
2. At some point after your ID is scanned, the Club shares the information contained within your ID (excluding the photo of your face) with Global Data.
3. Global Data sends an 'information match request' to the DVS system, which compares the information contained within your ID (excluding the photo of your face) against the relevant official record data.
4. Global Data receives an 'information match result' from the DVS system, which confirms whether the information contained within your ID matches the relevant official record data. The result will be 'yes' or 'no'.
5. The Club is notified of and records the information match result, and will physically compare the photo of your face on the ID against your face in-person.

This information is retained for at least three years to comply with our obligations under the Registered Clubs Act. Our digital sign-in system stores data on site only in a password protected encrypted database.

By providing the Club with your ID for verification using the DVS through Global Data, you confirm that you are authorised to provide the personal information presented and consent to your personal information being shared with Global Data to check your ID with the document issuer or official record holder via third party systems for the purpose of confirming your identity.

If you require further information about the operation and management of the DVS, you can access the following website: <https://www.idmatch.gov.au/individuals>.

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Do I have to scan my ID or agree to the use of the DVS?

No, you are not obliged to scan your ID or agree to the use of the DVS to verify your identity.

As mentioned above, the Club uses the DVS system to verify your identity privately, securely and quickly. If you do not agree to the Club using the DVS system to verify your identity, a Club employee may manually verify your identity at the Club's entrance desk. However, the Club is still required to inspect your ID.

If preferred, you can manually enter your name, address and signature (as required by the Registered Clubs Act) into the digital sign-in system and present your identification to staff who will confirm your details.

Why does the Club use I.D 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 and cumbersome and wasted paper.

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

ID scanners are a secure way of collecting and verifying information and assist us in providing a safe environment for you, other patrons and our staff. The use of ID scanners enables us to better comply with our responsible conduct of gaming responsibilities by identifying self-excluded patrons and persons of interest when they enter our venues and ensuring that they can be provided with the required assistance before remaining in our licensed premises or entering our gaming areas.

Surveillance of Venues

The venues in the Campsie RSL Group are subject to video and at times audio surveillance for security reasons including to monitor the safety of members, guests and employees. Details of suspected or actual illegal and/or undesirable activities on our premises may be shared with other clubs, law enforcement and regulatory bodies such as Liquor & Gaming NSW and the NSW Independent Liquor and Gaming Authority.

Security and storage

The Club is committed to keeping your personal information secure, and we will take reasonable precautions to protect your personal information from unauthorised access, loss, release, misuse or alteration.

Your personal information is held securely in our computer system and, where your personal information has been provided in hard copy format, this personal information is either destroyed, held securely on a Club site, held securely within the control of our sub-club representatives or held securely in off-site storage.

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.

Access and Correction

If you need to access your personal information that is held by the Club, you will be required to make a written request to the Club's Privacy Officer using the details below. 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. To change your name on the membership database, supporting documentation from a government source is required. Change of addresses can be done by completing a "Change of Address" form, by letter or by use of the internet.

The Club encourages its members to update or correct personal information, so that the information is accurate and current. If you believe the personal information we hold on you is incorrect, 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. We will take reasonable steps to correct Club records appropriately and within a reasonable time frame, except where the Privacy Act prohibits it or if there is an exception under law where we may refuse

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your correction request. The Club takes reasonable steps in the circumstances to ensure that the personal information it collects, uses or discloses is accurate, complete and up-to-date.

Complaints

If you wish to make a complaint about the Club's use of your personal information, please put your complaint in writing, providing as much detail as possible, and forward it by letter or email to the Privacy Officer using the details below. The Privacy Officer, or another representative of the Club, will investigate the complaint and will provide you with a written response within a reasonable time following the completion of the investigation.

Please allow us a reasonable time to respond to your complaint. If you are not satisfied with our resolution, you may make a complaint to the Office of the Australian Information Commissioner (**OAIC**) whose contact details can be found at: <https://www.oaic.gov.au/>.

Overseas Disclosure

Generally, the Club will not disclose personal information to overseas recipients except with your consent or where we are required or authorised to do so by law. The DVS process referred to above does not involve your personal information being disclosed overseas. Occasionally, we may disclose personal information to overseas recipients in the course of our business. Where we do disclose your personal information to overseas third parties, we will take such steps as are reasonable to ensure that your personal information is handled in accordance with the Privacy Act and this policy.

Please note that if you agree to your information being put on our Website or on our social media pages, then this information could be accessed by anyone in Australia and by persons in other countries.

Data Breach

If a data breach or suspected data breach occurs, we will undertake a prompt investigation, which will include an assessment of whether the incident is likely to result in serious harm to any individuals. In such a situation we will comply with the requirements of the Privacy Act which may require notification to the OAIC and affected individuals. Please contact us if you have reason to believe or suspect that a data breach may have occurred, so that we can investigate and, if necessary, undertake appropriate containment, risk-mitigation and notification activities as required.

Changes to Our Privacy Policy

The Club reserves the right to make changes to this policy from time to time. We will publish any changes on the Website at <http://www.campsiersl.com.au/Privacy.aspx>. 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.

Contact us – Privacy Officer

Further information on Privacy can be obtained by contacting the Club's Privacy Officer using the contact details below:

Privacy Officer

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CAMPSIE NSW 2194
Telephone: 02 9784 0200
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