

# Privacy Policy

Milton Ulladulla Ex-Servos Club Limited (the “**Club**”, “us”, “we”, “our”) is committed to providing you with the highest levels of customer service. This includes protecting your privacy and keeping you informed of our privacy policy.

Milton Ulladulla Ex-Servos Club Limited (the “Club”) registered under the *Registered Clubs Act 1976*.

The Club is required to comply with the provisions of the Privacy Act 1988 (“**Privacy Act**”) which regulates, among other things, the collection, storage, quality, use and disclosure of personal information.

The principal activities of the Club are:

- Providing a venue for members and guests to engage in social activities;
- Supporting the community;
- Providing members and guests access to a range of goods and services; and
- Providing a safe friendly environment for locals to meet.

## 1. About this Privacy Policy

The purpose of this policy is to explain how the Club complies with the Privacy Act and the Australian Privacy Principles (APP), which govern the way we must manage personal information (as defined in the Privacy Act), and to protect the personal information of our customers, which we take very seriously.

This policy sets out how we collect, hold, use, disclose and otherwise manage personal information about our members and other customers. We encourage all members and customers to check our website regularly for any updates to this privacy policy. We may update this policy whenever we consider appropriate, for example, to reflect changes to the law or to our business.

In this Privacy Policy, personal information means any information or opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in a material form or not.

By visiting the Club’s website, attending Club 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 Privacy Policy and consent to the handling of your personal information as set out in this Privacy Policy. If you do not agree with the terms of this Privacy Policy, please do not use our products, services, website or otherwise provide us with your personal information.

## 2. Collection

### General

Personal information will generally be collected directly from you through the use of any of our standard forms, membership application forms, competition entry forms, email, comments/contributions to our social media sites, visitor sign-in including sign-in terminals or when you deal with us in writing, by telephone or in person, and other ways of collection as set out above. We will not collect personal information (other than sensitive information) unless the information is reasonably necessary for, or directly related to, one or more of our functions or activities.

### Premises

The Club premises are subject to screening technologies and video surveillance at all times, and we collect your personal information this way, including by:

- (i) Collecting information from your driver's licence or other identification card, or membership card when you enter the premises, when you use the "Members' Kiosk", and at any of our Point-of-Sale terminals when we enter your membership card details;
- (ii) Collecting your car number plate details when you park in the car park of our premises;
- (iii) Using information from your driver's licence or other identification card or from your car number plate details, to match the personal information we hold about you;
- (iv) Monitoring member and guest behaviour in Club venues including with respect to the reasonable consumption of alcohol; and
- (v) Using facial recognition technology to collect information about your facial features for comparison against lists of self-excluded persons, suspended members and individuals and barred members and individuals.

### Internet

We also collect your personal information:

- (i) automatically when you use your computer to access the Club website or any Club APP or when you use your mobile device to access our websites or online resources;
- (ii) through you utilising the facilities of the Club such as booking a function, or receiving goods or services from the Club, or contacting the Club by telephone;
- (iii) through bookings and use of payment methods both electronically and otherwise with the Club;
- (iv) through you utilising the facilities of the Club such as booking a function, or receiving goods or services from the Club, or contacting the Club by telephone;
- (v) through bookings and use of payment methods both electronically and otherwise with the Club;
- (vi) when you visit the Clubs website, or use our other online resources, the Club may use cookies, single pixels tags and similar tracking technologies including tools provided by third parties such as Google, to collect or receive personal information;
- (vii) if you access the Club website or other online platform, or connecting wireless devices to a Club service or network, the information we collect may also include your IP address, type of operating system, browser type, domain name, date and time of interaction, pages you visit, location when accessing the website and your online behaviour; and
- (viii) by video surveillance.

### **Job applicants, staff, contractors, suppliers and volunteers**

The Club may also collect personal information about job applicants, Club staff, volunteers who work with us, and details of other people who come into contact with the Club such as contractors and suppliers for the primary purpose of assessing and engaging or employing the person. The Club also holds and uses such personal information for managing the employment or engagement to meet its legal obligations

### **Information received from other parties**

Sometimes, someone else may provide us with your personal information, with or without your direct involvement. For example, The Club might collect personal information from:

- another organisation of which you are a member, such as a local sporting club using our facilities, or community organisation;
- a regulatory authority, a local liquor accord or another club industry organisation including without limitation with respect to its statutory obligations; or
- your representative(s).

### **Failure to provide information**

If the personal information you provide to us is incomplete or inaccurate, we may be unable to provide you with the products or services you are seeking or admit you as a member or with entry to the Club's premises.

## **3. Use and Disclosure**

### **General**

Generally, the Club will only use and disclose personal information about you for the purpose for which it was collected, or for a related purpose as permitted by the Privacy Act or for uses for which you have given consent (which may be express or implied) including for the following:

- a) To know who you are, verify your age, identify you and process your membership applications and renewal;
- b) comply with requirements under the Registered Clubs Act, Corporations Act, Anti – Money Laundering and Counter Terrorism laws, and other relevant legislation;
- c) comply with obligations relating to the responsible provision of gaming services (if available on site),
- d) contact members and guests to advertise and market events, activities, opportunities, offers and the goods and services provided by the Club including without limitation with respect to food and beverage, promotions, entertainment, gaming, wagering, gaming machines, sporting events, KENO, TAB, functions and venue hire;
- e) send notices as required by the Club's Constitution, the Corporations Act, the Registered Clubs Act and or other law;
- f) analyse usage of food and services offered by the Club and provide you with goods or services you are receiving or utilising as offered by the Club;
- g) provide any benefits you become entitled to in relation to that product or service you have received or purchased from a Club;
- h) analyse website and other online resources usage;
- i) respond to your submissions, questions, comments, requests and complaints;
- j) conduct our internal business and management processes, for example accounting or auditing purposes;
- k) for any other purposes that would reasonably be expected by you as a result of disclosing your information to the Club or by being a Club Member;
- l) to use of the physical location of your mobile device for security purposes and to provide you with alerts, notifications and other information related to our products or services;

- m) for complying with obligations that we may have under laws that apply to our business or to meet requests from regulatory bodies which regulate our business, such as preparing player activity statements and monitoring the responsible provision of gambling services in our Club, including the exclusion of patrons from our Club.;
- n) when our facial recognition technology scans your facial features (collecting relevant biometric data) on entry to our club premises we use that information to check your facial features against the facial biometric data held by with Club with respect to excluded, barred or suspended persons or members;
- o) the use of your biometric data from photos from your identification previously provided to us, supplied to us by third parties, or from your member card photo, but only if you are an excluded, barred or suspended person or member, to inform our facial recognition technology to identify when you are entering our premises;
- p) for Club disciplinary charges and hearings; and to monitor your use of the Club services and facilities.
- q) to provide to relevant authorities when the Club believes that unlawful or undesirable activity is being or has been conducted; or
- r) To provide to anyone authorised by you to receive your personal information (your consent may be express or implied and can be withdrawn at any time).

When or before the Club collects personal information, the Club will take reasonable steps to inform you directly or indirectly of the purposes for which the information is collected; where applicable, any law that requires the particular information to be collected, and the main consequences for the user if all or part of the information is not provided.

#### **Disclosure to Enforcement Body**

If the Club discloses your personal information to an enforcement body, the Club will make a written note of the use or disclosure.

#### **Anonymity and Pseudonymity**

From time to time, you may be able to visit the Club website or deal with us anonymously or by pseudonym. However, please be aware that, if you do not provide us with certain personal information that we require, under law we may not be able to provide you with the products and/or services that you seek. When entering our premises you will be identified as required by the Registered Clubs Act and from that point, we will know you are in the club premises.

#### **Marketing and Promotional Materials**

We may send you direct marketing communications and information about our services/products, opportunities, member surveys, promotions or events that we consider may be of interest to you if you have requested or consented to receive such communications.

These communications may be sent in various forms, including mail, SMS and email, in accordance with applicable marketing laws, such as the Spam Act 2003 (Cth) which prohibits unrequested commercial messages. You consent to us sending you those direct marketing communications by any of those methods. If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.

You may opt-out of receiving marketing communications from us at any time by contacting us. We will include in each direct marketing communication a prominent statement that you may make such a request. In addition, we may also use your personal information or disclose your personal information to third parties for the purposes of advertising, including online behavioural advertising, website personalisation, and to provide targeted or retargeted advertising content to you (including through third party websites).

## **Visitors and Guests**

Under the Registered Clubs Act, patrons visiting the Club must produce a recognised form of identification i.e. passport, driver's license or proof of age card to gain entry to the premises. The Club uses terminals to gather this information and to protect the data collected i.e. addresses of patrons. Scanning of licences is optional and, if preferred, use of manual sign-in, via the terminals is available for patrons once the form of identification has been sighted by an authorised officer of the Club.

## **Surveillance of Venues**

The Club is monitored and recorded by Closed Circuit Television (CCTV) and at times audio surveillance for security reasons. At all times the Club will advise that your image may be captured before recording with prominent signage. 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 the Liquor & Gaming NSW and the Independent Liquor and Gaming Authority.

## **Use of Government Identifiers**

The Club will not adopt a government related identifier of an individual as its own identifier under any circumstances.

# **4. Disclosure**

## **Third Party Disclosure**

The Club may share your information with other parties who provide services to us, including organisations, agents, facial recognition technology suppliers, partners and contractors that assist us with providing our business processes and products and services. These contracts with third parties will require the third party to keep your personal information confidential and secure. These third parties may include (but are not limited to):

- (i) employees, third party service and content providers, dealers, agents, contractors, suppliers, business support services, payment processors, website hosting service providers, rewards and loyalty service providers, cloud storage providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors and professional advisors such as accountants, solicitors, business advisors and consultants;
- (ii) law enforcement bodies, courts of law or as otherwise required or authorised by law;
- (iii) regulatory or government bodies;
- (iv) any organisation for any authorised purpose with your express consent.

## **Government Disclosure**

The Club will as required by law, or upon reasonable request, disclose personal information to government departments, statutory bodies, authorities and law enforcement. Where authorised by law or by a reasonable request, or for any of the purposes outlined in this Privacy Policy, the Club may disclose personal information to government agencies including: The Australian Taxation Office; Australian Securities and Investments Commission; Centrelink; Child Support Agencies; and the Australian Financial Security Authority.

Before personal information about you is disclosed to a contracted third party, the Club will take steps as are reasonably practicable and appropriate in the circumstances to ensure that the third party does not breach the Australian Privacy Principles in relation to the information.

## 5. Securing your information

### Security

The Club has security systems in place which are intended to protect your personal information from misuse, interference, loss, unauthorised access, modification, or disclosure by the use of various methods including locked storage of confidential paper records and passworded access to computerised records (depending on the nature of the information that we are holding).

These measures include:

- (a) Training of all Club employees on their legal obligation in respect to the confidentiality of all information obtained.
- (b) Password security for all electronic devices including differing security levels for all Club employees, dependent on their level of responsibility.

### Destruction or De-Identification

We are required by law to keep some types of information for certain periods of time. If we no longer require your personal information or are required to hold it by law, we will generally destroy or de-identify it. We reserve the right to retain information for longer than the minimum period required under any applicable law if we consider that it is appropriate, but we will hold it in accordance with this policy.

If the Club receives personal information about you which it did not request and which it does not reasonably require, we may destroy or de-identify this information where appropriate.

### Cross Border Disclosure

Occasionally, we may disclose personal information to overseas recipients in the course of our business however such disclosure of personal information to overseas recipients is unlikely.

Please be aware that the privacy laws in other countries might not be the same as in Australia. However, 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 Australian Privacy Principles..

### Important Notice

By providing us with your personal information or otherwise using our products, services or website, you consent to the disclosure of your personal information to these overseas recipients. By consenting to this overseas disclosure, you acknowledge and agree that:

- (a) The Club will not be accountable under the Privacy Act for any breach of your privacy by an overseas recipient; and
- (b) You will not be able to seek redress from the Club under the Privacy Act for any breach of your privacy by an overseas recipient.

## **5. Correction**

The Club relies on the information provided by members to be accurate and current. 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.

If you believe the personal information we hold about you is incorrect and you seek correction of that information, please advise us in writing by sending a 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 your correction request. We will advise you of the outcome of any request to correct your personal information.

## **6. Access**

The Privacy Act allows individuals to access and alter records containing their personal information. If you wish to access the personal information the Club holds about you please provide a written request to the 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, such as passport or driver's licence is required. Change of addresses can be done by contacting reception.

## **7. Complaints**

If you wish to make a complaint about the Club's use of your personal information or you believe there may be a breach of this privacy policy, 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.

If you are not satisfied with the Club's response, you have the right to forward your complaint to the Office of the Australian Privacy Commissioner.

## **8. Changes to Our Privacy Policy**

The Club reserves the right to make changes to this Privacy Policy from time to time. We will publish any changes on the Club website at [www.ulladullaexservos.com.au/about/reports-notices](http://www.ulladullaexservos.com.au/about/reports-notices).

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.

## 9. Contact Us

### 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  
Milton Ulladulla Ex-Servos Club Limited  
212-222 Princes Highway  
ULLADULLA NSW 2539  
Telephone: 02 4455 1444  
Fax: 02 4454 0038  
[Email: enquiries@ulladullaexservos.com.au](mailto:enquiries@ulladullaexservos.com.au)