



## PRIVACY POLICY

### INTRODUCTION

Club Willoughby is committed to protecting your privacy, keeping your information safe, ensuring the security of your data, allowing you access to this privacy policy and to your personal information.

The Club understands the importance of maintaining members', guests and employees' trust and confidence. The Club shall ensure that the personal information you provide to the Club is only used in a manner consistent with this Privacy Policy.

### OBJECTIVE

This Privacy Policy describes the purposes for which the Club may collect, use and disclose your personal information and how it manages personal information held by the Club. Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- a) whether the information or opinion is true or not.
- b) whether the information or opinion is recorded in a material form or not.

### PRIVACY COMMITMENT

We are committed to complying with our obligations under the Privacy Act 1988 (Cth) (Privacy Act) by protecting the privacy and confidentiality of your personal information.

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.

Where appropriate, we will handle your personal information relying on the employee records exemption and the related bodies corporate exemption in the Privacy Act.

### PERSONAL INFORMATION

In general, we collect personal information so that we can perform our business activities and functions and to provide best possible quality of customer service.

We also collect personal information to comply with statutory requirements under legislation relating to registered clubs, liquor, gaming, anti-money laundering, counterterrorism and other legislation which may apply to the Club.

*What kinds of personal information does Club Willoughby collect and hold?*

We may collect and hold a wide range of personal information, and in some cases sensitive information, including but not limited to:

- your personal details, including your full name, residential address, email address, contact number, date of birth, gender, and occupation.
- your signature.
- information related to your entry to Club premises.
- an image of your driver's license or other identification if you choose to scan your ID when entering the Club's premises, including any information obtained from that identification (you have the option not to have your ID scanned and for the required information to be manually inputted into the Club's sign-in 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 in connection with Club Willoughby.
- information about what goods or services you buy or receive from Club Willoughby.
- details of your activities at or in connection with Club Willoughby, including your participation in social, sporting or other organised activities.
- the name and contact details of your next of kin.
- information connected to your use of our gaming machines (including your player activity statements and any prizes you receive).
- information about you related to a liquor or gaming self-exclusion or banning order about you from yourself, other licensed venues, MVSE, Bet Safe, TAB, ClubsNSW, a Liquor Accord or Liquor & Gaming NSW.
- things you say or do (or things said about you) in connection with an incident or potential disciplinary proceedings at or in connection with Club Willoughby.
- your payment details, including your bank account details and credit card details, where you have applied for a direct debit or other financial arrangement with the Club Willoughby.
- information about your use of our websites and social media pages, including your IP address, and any information collected by cookies as a result of your use of our websites and social media pages.
- your location if you install and use the Club Willoughby App.
- information related to your use of our Wi-Fi from any of your personal devices.
- if you apply for a job with us, the information in your resume, information about your qualifications, information about your immigration status and other information that you or your referees provide to us and notes of our interactions with you and/or others in relation to your prospective employment.

From time to time, we may collect additional information about you related to surveys, promotions and particular services or activities at or in connection with Club Willoughby.

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

### *How do we collect your personal information?*

Your personal information is collected as a result of your visits to, or dealings with Club Willoughby. Information is collected by recording information that you provide to us, by electronic means, and by the observations of our staff.

We collect personal information when you:

- enter, visit, or deal with Club Willoughby.
- apply for, or renew, your membership of the Club Willoughby or request to use our services.
- use your membership card at or in connection with Club Willoughby.
- purchase goods or services from Club Willoughby.
- use our gaming machines or request to be excluded from using our gaming machines.
- enter into a liquor self-exclusion agreement with us, or otherwise participate in a liquor self-exclusion program and nominate to exclude yourself from all or part of our premises.
- install, access, or use the Club Willoughby App
- access or use our Wi-Fi from any of your personal devices.
- attend a function or show.
- plan an event to be held at Club Willoughby.
- apply for a direct debit or other financial arrangement with Club Willoughby.
- participate in activities offered by Club Willoughby, including competitions and promotions.
- visit one of the websites or social media pages operated by Club Willoughby.
- are suspended, banned, or removed from any part of Club Willoughby premises.
- receive or request sponsorship through programs such as Club Grants.
- participate in, witness or are connected to an incident or disciplinary proceedings at or in connection with Club Willoughby.
- apply for, or renew, your membership of one or more of Club Willoughby sub-clubs or participate in the activities of those sub-clubs.
- apply for a job with us.

In general, if you contact us, we may keep a record of that correspondence. We may also collect information about you from other clubs and industry bodies if you have excluded yourself from there Club's premises as part of a liquor or gaming self-exclusion agreement or program (including in relation to the TAB and "MVSE" self-exclusion systems).

### *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 laws that require or authorise the collection.
- the purposes of the 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 Club Willoughby.
- 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 expect that you will tell them about this policy.

### *How do we use your personal information?*

We collect, hold, use and disclose your personal information to operate Club

Willoughby, carry out certain activities, provide products and services to you, other members and guests and other members of the public, and comply with our legal obligations. We also use your personal information for secondary purposes related to the above, or when permitted under the Privacy Act.

If you have self-excluded yourself from Club Willoughby premises and nominated other Clubs or licensed premises from which you also want to be excluded, we may disclose your personal information to the exclusion program operator (if any) and/or to the clubs and licensed premises that you have nominated directly to the extent necessary to assist those clubs and licensed premises to comply with your self-exclusion.

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

You can refuse any direct marketing by opting out of direct marketing material at Member Services, by updating your preferences on your account or by selecting unsubscribe on any marketing emails from Club Willoughby.

#### *Does Club Willoughby disclose my personal information to others?*

There may be times when we may need to disclose your personal information to third parties that we engage to provide services to or in connection with Club Willoughby, including our related entities, our insurers, our sponsors, our legal or financial advisers and other Club members.

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

We may need to disclose your personal information to third parties for the purposes of allowing us to carry out the activities and functions mentioned in this policy.

For example, from time to time, Club Willoughby engages external companies to send direct marketing information (usually via email or SMS), carry out mail services, and provide IT storage and other services.

A third party will only receive your personal information from Club Willoughby where that information is necessary for that third party to provide services to or in connection with Club Willoughby and the Club will always require that the third party comply with the Privacy Act when dealing with your personal information.

We will also disclose your personal information to third parties if we are required or authorised to do so by law, including to law enforcement agencies, the Office of the Australian Information Commissioner, the Australian Electoral Commission, the Department of Communities and Justice and the Australian Taxation Office.

## SCANNING YOUR IDENTIFICATION

### Visitor Sign In

The Club's electronic sign in system Circle Solutions utilised for the visitor sign in procedure for Club Willoughby. The Clubs electronic sign-in system Circle Solutions

specialises in 'Identification Data Capture' for the Hospitality Industry and is compliant with the Registered Clubs Act.

All data is maintained by Club Willoughby on a secure onsite server and personal information provided may be used for marketing and promotional purposes.

This system does not record/retain any specific identification numbers, for example your licence number. Photos are recorded only for the purpose of recognising those that are excluded from the venue. The use of this system is a condition of entry.

The system only records the following information from your ID:

- Name.
- Address.
- Date of Birth.
- Signature Image.
- Photograph.

## SURVEILLANCE (CCTV)

In the interest of safety for our members, guests and visitors, Club Willoughby has installed a network of CCTV cameras. The cameras are not intrusive and are carefully managed and supervised. All surveillance data is maintained by Club Willoughby on secure onsite servers. Data is collected and stored for a minimum of 30 days as required by law.

Access to surveillance data is restricted to relevant management personnel and all access to this data is automatically and securely logged for tracking purposes.

Relevant footage is provided to the Police or regulatory bodies such as Liquor & Gaming NSW or the Independent Liquor & Gaming Authority upon specific and documented requests and is subject to a procedure where the request is identified.

## FACIAL RECOGNITION TECHNOLOGY

Club Willoughby utilises facial recognition technology to consolidate the Club's security systems and to assist the Club in identifying individuals who are suspended, banned or self-excluded from our premises.

There are select security cameras that have been installed to use facial recognition technology to collect and analyse digital biometric data of individuals entering licensed gaming areas of the Club only. A person entering these designated areas will have their image biometrically processed and compared against a database of individuals who are suspended, banned, or self-excluded from our premises. Any person not on the database as an excluded image will have their details erased immediately and will not be held on any database anywhere.

If an individual's face image matches an image on the database, our staff will be alerted, and the individual will be removed from our premises. Club Willoughby will store the images of those who have been suspended, banned or self-excluded from our premises for such time until the suspension, ban or self-exclusion ceases.

## ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

If you need to access your personal information that is held by Club Willoughby, you will be required to make a request to the Club in writing, which can be given physically to Club reception, sent by mail to the Club or by email to [kreeve@clubwilloughby.com.au](mailto:kreeve@clubwilloughby.com.au)

We will provide you with access to the information requested within a reasonable period after the request is made, not exceeding 30 days.

We may charge you a reasonable fee for processing your request. We may decline a request for access to your personal information if the Privacy Act prohibits it or does not require us to provide access.

Club Willoughby encourages its members to update or correct personal information, so that the information is accurate and up to date. You may lodge a request to correct personal information that we hold about you if you believe it is inaccurate, incomplete, out-of-date, irrelevant, or misleading, in which case please contact the Club. This can be done via the Club reception, via mail or email. We will deal with your request in accordance with the Privacy Act.

## CHANGES TO THE PRIVACY POLICY

Club Willoughby reserves the right to make changes to this Privacy Policy from time to time. We will publish any changes on the Club website or Deputy.

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.

## DATA BREACH

If a data breach or suspected data breach occurs, Club Willoughby will undertake a prompt investigation, which will include an assessment of whether the incident is likely to result in serious harm to any individuals. Pending the suspected data breach, this investigation may be done in accordance with our Cyber Security Policy.

In such a situation we will comply with the requirements of the Privacy Act which may require notification to the Office of the Australian Information Commissioner (OAIC) and affected individuals

## PRIVACY COMPLAINTS

If you wish to make a privacy complaint, please put your complaint in writing with as much detail as possible and send it to us by letter or email using the details listed below:

Chief Executive officer  
Club Willoughby 26 Crabbes Avenue  
North Willoughby NSW 2068  
Email: [mmachado@clubwilloughby.com.au](mailto:mmachado@clubwilloughby.com.au)

The CEO or another representative of the Club, will consider (and may investigate) the complaint and provide you with a written response within a reasonable timeframe (taking into consideration the nature of your complaint).

If you are unhappy with how we handle your issue or complaint, you are entitled to make a privacy complaint to the Office of the Australian Information Commissioner. Please visit the Office of the Australian Information Commissioner's website for contact details: <https://www.oaic.gov.au/>