

Purpose of Policy

The purpose of this policy is to outline the CRSL Privacy policy.

Policy Scope

This document applies to all Cronulla RSL employees, Directors, Members & Guests.

Policy Procedure

The Privacy Act 1988 (the “Act”) regulates the handling of personal information about individuals. This includes the collection, use, storage and disclosure of personal information, and access to and correction of that information. The Act binds certain entities including the Cronulla RSL Memorial Club Limited, trading as Cronulla RSL (the “Club”) and establishes 13 Australian Privacy Principles (“APP”) that apply to the handling of personal information by the Club.

APP 1.3 requires the Club to have a clearly expressed and up to date policy about the management of personal information. This Privacy Policy is intended to meet the Club’s obligations under APP 1.3.

Who does this policy apply to and what does it cover?

This policy sets out how Cronulla RSL Memorial Club Limited and its related entities (“Club”, “we”, “us” or “our”) collect, use, disclose and hold “personal information”.

“Personal information” means information or an opinion about an individual (who can reasonably be identified), whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not.

What is our privacy commitment to you?

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.

What kinds of personal information does the Club collect and hold?

We collect and hold a wide range of personal information, and in some cases sensitive information, including:

- 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 the Club's premises;
- a photo of you for your membership card;
- a copy of your "face print" derived from images or video of you, to assist the Club to identify individuals who have been suspended, banned or self-excluded from the Club's premises, and any metadata associated with the Club's use of facial recognition technology;
- an image of your driver's licence or other identification if you choose to scan your ID when entering the Club, including any information obtained from that ID (you have the option not to have your ID scanned and for the required information to be manually inputted into our 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 the Club;
- information about what goods or services you buy or receive from the Club;
- details of your activities at or in connection with the Club, including your participation in social or sporting activities;
- health information, including any medical conditions you may disclose to us to enable us to provide goods or services to you;
- 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 prizes you receive);
- information about you related to a liquor or gaming self-exclusion or banning order about you from yourself, other clubs, BetSafe, 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 disciplinary proceedings at or in connection with the Club;
- 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;
- information related to your use of our Wi-Fi from any of your personal devices;
- images or video of you at the Club's premises, including photographs or videos of you participating in activities and events at the Club and images of you which are collected by our CCTV cameras and designated security cameras which use facial recognition; and
- 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 the Club.

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, the Club. 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 the Club;
- apply for, or renew, your membership of the Club or request to use our services;
- use your membership card or other issued cards at or in connection with the Club;
- purchase goods or services from us;
- 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;
- access or use our Wi-Fi from any of your personal devices;
- attend a function or show at a venue we operate;
- plan an event to be held with us;
- participate in activities offered by the Club, including competitions and promotions;
- visit one of the websites or social media pages operated by the Club;
- are suspended, banned or removed from any part of the Club's premises;
- receive or request sponsorship through programs such as ClubGRANTS;
- are involved in, witness or are connected to an incident or disciplinary proceedings at or in connection with the Club;
- apply for, or renew, your membership of one or more of the Club's sub-clubs or participate in the activities of those sub-clubs; and/or
- apply for a job with us.

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

We only collect personal information about you from you (or if you are under 15 years of age, from your parent or legal guardian), unless it is unreasonable or impractical to do so. For example, it may be unreasonable or impractical to collect information from you (or your parent or legal guardian if you are under 15 years of age) when the information is provided by other members, our staff or the Police.

We may also collect information about you from other clubs and industry bodies if you have excluded yourself from the Club's premises as part of a liquor or gaming self-exclusion agreement or program (including in relation to the "ClubSAFE", BetSafe and TAB 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 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 expect that you will 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 the Registered Clubs Act 1976 (Registered Clubs Act), Corporations Act 2001 (Corporations Act), Gaming Machines Act 2001, Liquor Act 2007, Anti-Money Laundering and Counter-Terrorism Financing Act 2006 and Work Health and Safety Act 2011.

For example, when a person applies for membership of the Club, we must collect details including their name and address. We must display a person's name on the Club's notice board before our Board is able to consider the application for membership. We also may need to provide this information to any member of the general public who makes a request under certain legislation, including the Corporations Act.

Temporary members, guests of members and other visitors to the Club may be required to produce a recognised form of identification (such as a driver's licence or passport) to gain entry into the licenced premises.

If you elect to use our electronic ID scanner, we will collect information from your ID at the time you enter the Club. More information about our electronic ID scanners appears in our Frequently Asked Questions section below.

For what purposes does the Club collect, hold, use and disclose your personal information?

We collect, hold, use and disclose your personal information to operate the Club, 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. The purpose of collecting your personal information is to undertake one or more of the following activities or functions:

- consider applications and renewals of membership;
- identify who comes to the Club and verify their details, including age and address;
- identify individuals who have been suspended, banned or self-excluded from the Club's premises;
- create registers and display information as required by the Registered Clubs Act;
- provide a safe environment for you, other members and guests and our staff;
- provide services to you, other members and guests;
- carry out accounting and finance requirements and legal and administrative reporting requirements;
- provide Wi-Fi at the Club;
- provide an events management service;
- operate functions at our venues;
- carry out competitions and promotions;
- perform gaming operations;
- publish and distribute newsletters;

- carry out marketing (including direct marketing);
- offer and manage sponsorships including by supporting community sports and social events;
- provide ticketing services;
- offer dining options and other entertainment, including shows;
- operate the Club's sub-clubs, including publishing contact details of committee members;
- conduct elections of the Board;
- investigate an incident or conduct disciplinary proceedings at or in connection with the Club;
- resolve a complaint;
- assess an applicant's suitability for employment;
- maintain a social record of the Club and its community, including sharing photographs of activities and functions at the Club via the Club's website and social media pages;
- promote the objects of the Club; and
- improve our services and increase membership of the Club.

What happens if you don't provide your personal information?

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

If you provide us with some but not all of the information sought, then, depending on the information withheld, we may be able to provide you with certain goods and services but only to a limited extent. For example, if you disable cookies on our websites, certain features and functions on our websites may not work.

You have the option of not identifying yourself, or of using a pseudonym, when dealing with us. However, this will be limited to enquiries of a very general nature and only over the telephone or by email.

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

How do we use your personal information?

We use your personal information primarily to allow us to carry out the activities and functions listed above. We also use your personal information for secondary purposes related to those activities and functions, or when permitted under the Privacy Act.

If you have self-excluded yourself from the Club's 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 the clubs and licensed premises that you have nominated to the extent necessary to assist those clubs and licensed premises to comply with your self-exclusion.

The Club 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 the Club or services offered by the Club.

You can refuse any direct marketing by contacting our Privacy Officer.

Does the Club 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 the Club, including our related entities, our insurers, ClubsNSW, 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, the Club 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 the Club where that information is necessary for that third party to provide services to or in connection with the Club 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 Family and Community Services and the Australian Taxation Office.

FREQUENTLY ASKED QUESTIONS

How does this policy apply to the Club's sub-clubs and its related entities?

The Club has a number of sub-clubs that form part of the Club.

For the purposes of the Privacy Act, a sub-club's collection, use, disclosure or storage of your personal information is the Club's collection, use, disclosure or storage of your personal information.

If a sub-club (being part of the Club) collects, uses, discloses or stores your personal information, it will comply with this policy when doing so.

The Club may have one or more related entities, also known as "related bodies corporate".

These related entities are separate legal entities to the Club, but are related to the Club in some way (e.g. the Club owns the related entity, or the related entity owns the Club).

The Privacy Act permits related entities to share personal information in certain circumstances.

If an entity related to the Club collects, uses, discloses or stores your personal information, it will comply with this policy when doing so (unless that entity has its own privacy policy).

Is there surveillance at the Club?

All venues operated by the Club are subject to video and audio surveillance for security reasons, including to monitor the safety of members, guests and employees and to protect the Club's 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 and law enforcement agencies.

Will I be photographed at the Club?

The Club may from time to time, take photographs and videos of patrons participating in activities and events at the Club, which the Club may publish on its websites and/or social media pages. The Club does so for marketing and promotional purposes and to maintain a social record of the Club and its community.

It is a condition of entry to the Club's premises that you consent to the Club taking photographs and/or videos of you for these purposes.

Wherever reasonably practicable, the Club's photographers will ask you if you are happy for your photograph to be taken and put on the Club's websites and/or social media pages. However, it will not always be reasonably practicable for the Club to do so and the Club may not ask your permission to photograph you if it is taking a photograph of a crowd or large group of people, or if you cannot be identified from the photo.

The Club will never take photographs of you in circumstances where you would have a reasonable expectation of privacy. If there is a photograph of you on the Club's website or social media which you consider to be inappropriate, please contact us to have it removed.

Will my face be subject to facial recognition technology at the Club?

It is likely that when you are at the Club's premises, your face will be analysed by the Club's facial recognition technology.

Designated security cameras located throughout the Club's premises use facial recognition technology to collect and analyse the "face prints" of individuals.

A "face print" is a set of biometric characteristics (such as information about the relative location, size and shape of an individual's facial features) which is used to uniquely identify an individual's face and is expressed as a mathematical algorithm.

When you are at the Club's premises, the Club's designated security cameras will capture a photo of your face, analyse your facial features in that image and then create a "face print" of your face based on that photo.

Your "face print" will then be compared against a secure database maintained by the Club that contains the "face prints" of individuals who have been suspended, banned or self-excluded from the Club's premises.

If your "face print" matches the "face print" of an individual who has been suspended, banned or self-excluded from the Club's premises, the Club's staff will be alerted and steps will be taken to remove you from the Club's premises. The "face print" created using the image captured by the Club's designated security cameras will be deleted after the alert has been sent to the Club's staff.

If your "face print" does not match the "face print" of an individual who has been suspended, banned or self-excluded from the Club's premises, your "face print" will be immediately deleted.

For the purposes of enabling the “face print” matching referred to above, if an individual has been suspended, banned or self-excluded from the Club’s premises, the Club will collect a copy of that individual’s “face print” from a photo of that individual held by the Club (e.g. from the photo on the individual’s membership card) and will hold a copy of that “face print” for so long as the individual is suspended, banned or self-excluded from the Club’s premises.

Why does the Club use facial recognition software?

The Club has introduced facial recognition technology at the Club’s premises to enhance the Club’s security procedures and assist the Club to identify and remove persons who have been suspended, banned or self-excluded from the Club’s premises. The Club does not use your “face print” for any other purpose.

The temporary collection of your “face print” is reasonably necessary for the activities and functions of the Club.

The Club will not store your “face print” unless you have been suspended, banned or self-excluded from the Club’s premises.

Do I have to use the electronic ID scanner to enter the Club’s premises?

No. You are not obliged to scan your identification to enter the Club’s premises.

If you prefer, you can ask our staff to manually enter your name, address and signature (as required by the Registered Clubs Act) into the system and present your identification to staff who will confirm your details.

What information is collected from the electronic ID scanners?

The electronic scanners used by the Club may scan a full copy of your ID.

Where this applies, the Club may collect all of the information recorded on your ID (which may include sensitive information).

Why does the Club use ID scanners?

Under the Registered Clubs Act, we are required to maintain a register of the name, address and signature of temporary members and guests over the age of 18 who enter the Club’s premises. This information must be retained by us for at least three years.

We are also required to take steps to verify the identity of any members and guests who use our gaming machines under the Anti-Money Laundering and Counter-Terrorism Financing Act and its associated rules and regulations.

ID scanners are a secure way for the Club to collect information about persons entering the Club’s premises.

ID scanners are also environmentally friendly in that they have helped the Club reduce its paper usage and storage of certain hardcopy records.

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.

How do we hold and protect your personal information?

Personal information that is held by us is stored electronically and/or in hardcopy.

We take reasonable steps to ensure that your personal information is safe and secure from unauthorised access, use or disclosure.

Information that we store electronically is held in secure and password protected databases.

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

Your personal information is securely destroyed when it is no longer needed or when it is out of date.

What happens if my personal information is involved in a data breach?

The Club has various security measures in place to protect your personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure.

In the unlikely event that the Club's security measures are compromised and your information is the subject of a data breach, the Club will comply with its obligations for responding to data breaches outlined in the Privacy Act.

Upon becoming aware of a data breach, the Club will take urgent steps to contain the breach, mitigate any risk of harm and determine who may have been affected.

The Club will then assess the breach, including any potential for harm, and determine whether the breach is likely to result in serious harm to any person whose data was involved.

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

Following a breach, the Club will conduct a review of its security measures and implement any additional measures it considers necessary to enhance the security of your information.

Are we likely to disclose personal information overseas?

It is unlikely that we will disclose your personal information overseas. However, if you agree to information being put on our websites or social media pages then this could be accessed by other countries.

Our primary servers are stored in Australia.

We occasionally use secure cloud servers. This involves the use of servers that may be located in other countries and may constitute a disclosure under the Privacy Act.

We will always require that any third party software and storage providers who are based overseas comply with the Privacy Act when dealing with your personal information.

Using the Club's websites and social media pages

The websites and social media pages operated by or in connection with us may collect personal information for the purposes outlined in this policy.

Any information collected by us as a result of your use of those websites and pages will be handled in accordance with this policy.

Those websites and pages may also use cookies and contain hyperlinks to other websites and pages, including those operated by third parties.

Any hyperlinks are provided for reference only. We do not have control over websites and pages operated by third parties and are not responsible for the content available on such websites or pages or the privacy practices of those third parties.

There will also be instances when dealing with the Club's 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 if you wish to make an online payment. Generally, we do not have control over these third-party providers and how they collect and handle any personal information that you provide to them. We also typically have limited access to the information they collect and hold. The Club does not accept any liability for the action of any such third-party providers. We strongly encourage you to read a third party's privacy policy as it will likely contain provisions which are specific to the third-party's activities and functions. For instance, a third-party payment platform provider will likely collect your billing and financial details and may disclose your financial information with your bank to verify your identity, to verify the information you have provided, to process your transaction and to advise us whether your payment has been successful.

What does this policy mean?

By entering, visiting or dealing with the Club, you consent to the terms of this policy.

The Club will also seek your express consent for the collection, use or disclosure of your personal information for purposes set out in this policy wherever reasonably practicable.

From time to time, your additional consent will be sought for the collection, use or disclosure of your personal information for purposes other than as set out in this policy.

If you do not agree to this policy or do not wish to receive direct marketing information from or in connection with the Club, please contact our Privacy Officer.

How do I access, update or correct the personal information held by the Club about me?

You have a general right to access any personal information which we hold about you. You can request access to the personal information we hold about you by contacting our Privacy Officer.

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.

There are a number of reasons why we may be unable to give you access to your personal information held by the Club. If we are not able to provide access, we will provide you with written reasons.

If you believe any of the personal information that we hold about you is incorrect or out-of-date, you can ask us to correct it and we will take reasonable steps to ensure that it is accurate, up-to-date, relevant and not misleading. To assist us to update your information, we may need you to provide us with evidence of your new details.

If we refuse to correct your personal information, we will give you written reasons.

How do I make a complaint about privacy related to the Club?

If you believe we have breached the Privacy Act or any of the Australian Privacy Principles, or if you have any issues about the Club's collection, use, disclosure or storage of your personal information, please contact our Privacy Officer.

When contacting our Privacy Officer, please give us enough details to be able to identify you, understand your issue or complaint and respond appropriately.

We will respond to you within a reasonable timeframe (usually not more than 30 days).

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.

How do I contact the Privacy Officer at the Club?

You can contact the Club's Chief Executive Officer, Ms Sue McNeill, as follows:

Phone: (02) 8582 5001

Email: Sue.McNeill@cronullarsl.com.au

Post: 38 Gerrale Street, Cronulla NSW 2230.

How do I contact 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/>.

Requests for Change

This Policy may change. We will let you know of any changes to this Policy by posting a notification on our website at www.cronullarsl.com.au.

Any information collected after an amended privacy statement has been posted on the site, will be subject to that amended privacy statement.

Requests for changes or improvements to this document should be forwarded to the Owner identified in the document footer. Any changes to this document must be approved by the CEO.