

PRIVACY POLICY

CLUB PRIVACY COMMITMENT

Raymond Terrace Bowling Club Cooperative Ltd (the “**Club**”, “us”, “we”, “our”) 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.

COMPLIANCE

The Club is required to comply with the provisions of the Privacy Act 1988 (Cth) (“**Privacy Act**”). This includes a requirement to comply with the terms of the Australian Privacy Principles (“APP”) which are set out in the Privacy Act.

In summary, the Australian Privacy Principles cover the following:

- The collection, use and disclose of personal information, including overseas disclosure requirements.
- The open and transparent management of personal information including having a privacy policy and having that privacy policy easily accessible.
- An individual having the option of transacting anonymously or using a pseudonym where practicable.
- The collection of solicited personal information and receipt of unsolicited personal information.
- Maintaining the integrity of personal information.
- Maintaining the security of personal information.
- Right for individuals to access and correct their personal Information.

SCOPE

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; and
(b) whether the information or opinion is recorded in a material form or not.
This policy applies to all Club owned legal entities and venues.

COLLECTION OF PERSONAL INFORMATION

The Club collects personal information from members including member name, address, occupation, date of birth, proof of age and contact details. The Club also monitors the extent of your use of goods and services offered by the Club and through that use of goods and services may collect additional information. The Club will also collect from visitors, guests and other individuals, personal information.

The Club collects personal information from individuals, including members, visitors and guests, by a variety of means including:

- membership application or renewal form;
- competitions and promotions;
- sports registration forms;
- gym membership forms;
- sign in terminals;
- Automatically when you use your computer to access the Club website or any Club APP;
- Automatically when you use your mobile device to access our websites or online resources;
- Through you utilising the facilities of the Club such as booking a function, or receiving goods or services from the Club;
- through bookings and use of payment methods both electronically and otherwise with the Club;
- accessing publicly and commercially available personal, identity, geographic and demographic information.
- 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; and
- 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.



Personal information, including information about you obtained as a result of you placing your membership card in a gaming machine or other Club outlet (not ATM's unless you consent to it linking your Club details and the relevant loyalty program) that is linked to a member loyalty system, may also be used by the Club for marketing and promotional purposes. You may receive marketing material by way of telemarketing, targeted digital advertising, SMS, MMS messages, and notifications and alerts to your mobile device.

The Club premises are subject to screening technologies, video and at times audio surveillance including:

- (i) Collecting information from your driver's licence or other identification card when you enter the premises; or
- (ii) Collecting your car number plate details when you park in the car park of our premises; or
- (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; or
- (iv) Monitoring member and guest behaviour in Club venues including with respect to the reasonable consumption of alcohol.

When visiting the Club a guest must provide either their Driver's License, Passport or other recognised and acceptable form of identification to gain entry to the premises. The Club uses terminals, or other means, to gather this information.

COLLECTION OF SENSITIVE INFORMATION

Sensitive information will be collected from members and guests if the Club is providing a fitness centre or a supervised play area. A supervised play area will require disclosure of sensitive information in relation to the children receiving the service. A fitness centre will require personal health information to be disclosed to ensure your personal safety. Any sensitive information is only collected with your consent, or if required by law or if permitted by the Privacy Act.

Sensitive information will also be collected from employees. These include health information such as incident and accident reports, medical and doctor's certificates, sick leave and attendance records (biometric scanning/facial recognition), workers compensation claims and related information, and medical histories and assessments, including for insurance purposes.

The Club will not otherwise usually collect information about your racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual

preferences, criminal records, or health information. If the Club does so, it will only collect such information where:

- (i) We have obtained your consent; or
- (ii) If you apply for a job with the Club; or
- (iii) We are otherwise permitted by law to do so

We note that section 20A of the Anti Discrimination Act 1977 (NSW) states that in relation to discrimination on the bases of race that certain exceptions apply if, or in respect of, a Registered Club if the principal object of the Registered Club is to provide benefits for persons of a specified race as defined otherwise by reference to a persons colour, or a description which has the effect of excluding persons of that race who are of a different colour.

The Club may collect health information about an individual if:

- (a) the information is necessary to provide a health service to the individual; and
- (b) the information is collected:
 - (i) As required by law (other than the Privacy Act); or
 - (ii) In accordance with rules established by competent health or medical bodies that deal with obligations of professional confidentiality which bind the Club

Despite 5.4, the Club may collect health information about an individual if:

- (a) The collection is necessary for any of the following purposes:
 - (i) Research relevant to public health or public safety;
 - (ii) The compilation or analysis of statistics relevant to public health or public safety;
 - (iii) The management, funding or monitoring of a health service; and
- (b) that purpose cannot be served by the collection of information that does not identify the individual or form which the individual's identity cannot reasonably be ascertained: and
- (c) its impractical for the Club to seek the individual's consent to the collection; and
- (d) the information is collected:
 - (i) As required by law (other than the Privacy Act); or
 - (ii) In accordance with rules established by competent health or medical bodies that deal with obligations of professional confidentiality which bind the Club; or
 - (iii) In accordance with guidelines approved by the Privacy Commissioner under section 95A of the Privacy Act.
 - (iv) If the Club collects health information about an individual in accordance with 5.5, the Club will take reasonable steps to permanently de-identify the information before the Club discloses it.

STORAGE OF PERSONAL INFORMATION

Our staff are trained on how to keep your information safe and secure. The Club will take steps as are reasonable in the circumstances to protect personal information:

- (a) from misuse, interference and loss; and
- (b) from unauthorised access, modification or disclosure.

We may store your information in hard copy or electronic format and keep it in storage facilities that we own and operate ourselves, or that are owned and operated by our service providers.

We use a combination of technical solutions, security controls and internal processes to help us protect your information and our network from unauthorised access and disclosure.

We endeavour to ensure that personal information is kept as current as possible and that irrelevant or excessive data is deleted or made anonymous as soon as reasonably practicable.

However, some personal information may be retained for varying time periods in order to comply with legal and regulatory obligations and for other legitimate regulatory or business reasons.

USE AND DISCLOSURE OF PERSONAL INFORMATION

The Club is careful about how it uses your personal information. The Club will only use or disclose your personal information for the purpose for which you have provided it, or for purposes as permitted by the Privacy Act or for the purposes that are set out in this Privacy Policy.

USE OF PERSONAL INFORMATION

The Club will only use your information if we have a lawful reason to do so such as when it's our legal duty or we have your consent and when it's in our legitimate interest to do so.

When collecting personal information, the Club will inform the individual providing the information of:

- (i) The purposes for which the information is collected
- (ii) Any law that requires the particular information to be collected if applicable, and
- (iii) The main consequences for the user if the information is not provided.

The Club collects personal information from members and guests in order to:

- (i) To know who you are, verify your age, identify you and process your membership application and renewal;
- (ii) Comply with requirements under the Registered Clubs Act, Corporations Act, Anti Money Laundering and Counter Terrorism laws and other relevant legislation;
- (iii) 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, gaming, sporting events, KENO, TAB and venue hire;
- (iv) Send you notices as required by the Club's Constitution, the Corporations Act, The Registered Clubs Act and or other law;
- (v) Analyse usage of food and services offered by the club;
- (vi) Provide you with goods or services you are receiving or utilising as offered by the Club;
- (vii) Provide any benefits you become entitled to in relation to that product or service you have received or purchased by the club;
- (viii) Analyse website and other online resources usage;
- (ix) Respond to your submissions, questions, comments, requests and complaints;
- (x) Conduct our internal business and management processes, for example accounting or auditing purposes
- (xi) 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;
- (xii) The collection and 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;
- (xiii) Complying with obligations that we may have under laws that apply to our business or to meet reasonable 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 our club; and
- (xiv) To monitor your use of the club services and facilities.

For employees, we may use your personal information, and may disclose it to third parties, for any purpose directly related to your employment, or former employment, with us. Without limiting this, we will need to use your personal information to administer your employment. This may include assessing applications for employment, managing your performance, attendance and duties, professional development, managing salary and sick leave entitlements and payments, managing workers compensation and workplace health and safety issues, complying

with any statutory or legal obligations, managing insurance obligations and insurance claims, and maintaining and developing our business systems and infrastructure. The Club will not use your personal information for any other purpose, nor will we disclose it, unless we have your consent or in other circumstances where such use or disclosure is permitted under the Privacy Act.

ILLEGAL AND UNDESIRABLE ACTIVITY

Details of suspected or actual illegal activities on our premises may be shared with other clubs, law enforcement and regulatory bodies such as Liquor and Gaming NSW and the Independent Liquor and Gaming Authority.

ANONYMITY AND PSEUDONYMITY

You may be able to deal with us anonymously or by pseudonym through various media. However, we advise that if you do not provide us with certain personal information that is required, the Club may not be able to provide the products and/or services requested. For example; If you are a member then your membership may not be able to continue. You may not deal with the Club anonymously if:

- (i) It is impracticable to operate and communicate with you if you have not identified yourself; or
- (ii) Where the Club is required by law or an order from a court or tribunal requires the Club to only deal with you if you have identified yourself. Such as to be a member of the Club.

THIRD PARTY DISCLOSURE

The Club may share your information with other parties who provide services to us, including organisations, agents, 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. The Club will as required by law, or upon reasonable request, disclose personal information to government departments, statutory bodies, authorities and law enforcement. 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, 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) Persons involved in a proposed or actual transfer or sale of all or part of our assets or business, corporate restructure or investment transaction;
 - (v) Any organisation for any authorised purpose with your express consent.

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:

- (i) The Australian Taxation Office
- (ii) Australian Securities and Investments Commission
- (iii) Centrelink
- (iv) Child Support Agencies
- (v) 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.

CROSS BORDER DISCLOSURE OF INFORMATION

The Club may occasionally disclose personal information to overseas recipients, for example: when we, or our third party service providers store, process or back-up your personal information on servers that are located in overseas jurisdictions.

The Club will transfer personal information about an individual to someone (other than the Club or the individual) who is in a foreign country only if:

- (i) The Club reasonably believes that the recipient of the information is subject to a law, binding scheme or contract which effectively upholds principles for fair handling or the information that are substantially similar to the Club's Privacy Protection Policies;
- (ii) The individual consents to the transfer; or
- (iii) The transfer is necessary for the performance of a contract between the individual and the Club, or for the implementation of pre-contractual measures taken in response to the individual's request; or
- (iv) The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the individual between the Club and a third party; or

- (v) All of the following apply
- (vi) The transfer is for the benefit of the individual;
- (vii) It is not practicable to obtain the consent of the individual to that transfer; and
- (viii) If it were practicable to obtain such consent, the individual would be likely to give it; or
- (ix) The Club has taken reasonable steps to ensure that the information, which it has transferred, will not be held, used or disclosed by the recipient of the information consistently with the Club's Privacy Protection Principles.

Where we 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 this Privacy Policy and that the overseas recipient does not breach the Australian Privacy Principles in relation to the information.

By consenting to this overseas disclosure, you acknowledge and agree that:

- (i) The Club will not be accountable under the Privacy Act for any breach of your privacy by an overseas recipient; and
- (ii) 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.

ACCESS TO AND CORRECT OF PERSONAL INFORMATION

You can contact us and ask to view your information. All individuals have a right to request access to personal information the Club holds about them. If you desire to view the personal information the Club has for you, please provide a written request to the Privacy Officer of the Club. The Club will provide you with access to your personal information except where the Privacy Act prohibits it or if there are exceptions under law where we may refuse your request for access.

The Club will take steps (if any) as are reasonable in the circumstances to ensure that the personal information that the entity collects is accurate, current and complete. To ensure that we are able to provide you with the best products and services possible, it's important that you make sure the personal information we hold about you is accurate, up-to-date and complete.

If your information is not correct, please let us know so we can correct it. The Club will take reasonable steps to correct any Club records if you believe the personal information we hold on you is incorrect. Please advise us of any incorrect information, in writing by sending your letter or email to the Privacy Officer and please provide the correct information when doing so. The Club will endeavour to correct any incorrect information within a reasonable time frame, except where the Privacy Act prohibits it or if there is an exception under law where the Club may refuse your correction request.



ACCEPTANCE

You confirm your acceptance of the terms and conditions of this Privacy Policy and consent to the handling of your personal information as set out in this Privacy Policy by providing your personal information to us by any means. This includes the means of disclosure set out in the section below titled Collection of Personal Information. If you do not agree with the terms of this Privacy Policy, please do not use our products or services, website or provide your personal information.

HOW TO MAKE A COMPLAINT?

If you wish to make a complaint about the Club's use of your personal information or a breach by the Club of the Australian Privacy Principles, please put your complaint in writing, providing as much detail as possible, to the Privacy Officer using the details below. The Club will treat your requests or complaints confidentially.

The Privacy Officer, or another representative of the Club, will investigate the complaint and will provide you with, an estimated timeframe for when we will respond to your complaint and a written response within a reasonable time, following the completion of the investigation. While we hope that the Club will be able to resolve any complaints you may have without needing to involve third parties, you may also be able to lodge a complaint with the Australian Information Commissioner.

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 or other online application. 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.

You may opt out of receiving direct marketing communications from the Club at any time, by contacting the Club (see contact information below for the Club's Privacy Officer). If you receive any direct marketing email from the Club, you may follow the directions within that material i.e. an unsubscribe link located in the email. The Club will ensure that your name is then removed from any relevant mailing list. The Club does not sell your personal information to other organisations for the purposes of direct marketing.



CONTACT US

If you do not wish to receive further advertising material, wish to change your contact details, or have any other privacy-related queries, please advise us by contacting the Club on 0249872404 OR email enquiries@rtbc.com.au.