



PRIVACY POLICY

(current at 23/07/2020)

1. Club Privacy Commitment

1.1 Blacktown Workers' Club Ltd (ABN 21 000 858 006) ("the Club") is committed to the protection of personal privacy as required under the Privacy Act 1988 (Commonwealth) ("the Privacy Act") and the associated Australian Privacy Principles. This includes protecting your privacy and ensuring you have access to this Privacy Policy. Any personal information provided by you to the Club will only be used in a manner consistent with this Privacy Policy.

2. Compliance

2.1 The Club is required to comply with the provisions of the Privacy Act 1988 (Commonwealth) ("Privacy Act"). The Club understands that privacy is important to its members and guests. This is why the Club is clear and open about what it does with your personal information and how it protects your personal information. This includes a requirement to comply with the terms of the Australian Privacy Principles ("APPs") which are set out in the Privacy Act.

2.2 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 transaction 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.

3. Scope

3.1 The Club protects your personal information and aims in this policy to be clear about what it can do with it. This Privacy Policy describes the purposes for which the Club may collect, use and disclose your personal information and how the Club manages personal information held by it.

3.2 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.

Blacktown Workers Club Ltd.

ABN 21 000 858 006

Workers Blacktown

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Phone

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workerslifestylegroup.com.au

This policy applies to all Club owned legal entities (if any) and venues.

4. Collection of Personal Information

- 4.1 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.
- 4.2 The Club collects personal information from individuals, including members, visitors and guests, by a variety of means including:
- Membership application or renewal forms;
 - Competitions and promotions entries;
 - 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; and
 - Video and audio surveillance.

Personal information, including information about you obtained as a result of you placing your membership card in a gaming machine or other Club outlet 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, email, SMS, MMS messages, and notifications and alerts to your mobile device.

- 4.3 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.

4.4 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 including by way of scanning your driver's license.

5. Collection of Sensitive Information

5.1 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.

5.2 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.

5.3 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) Colour,
- b) A description which has the effect of excluding persons of that race who are of a different colour.

5.4 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.

5.5 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 from which the individual's identity cannot reasonably be ascertained; and
- c) It is impracticable 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.

5.6 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.

6. Storage of Personal Information

- 6.1 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.
- 6.2 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.
- 6.3 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.
- 6.4 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.
- 6.5 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.

7. Use and Disclosure of Personal Information

- 7.1 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, for purposes as permitted by the Privacy Act or for the purposes that are set out in this Privacy Policy.
- 7.2 *Use of Personal Information*
- 7.3 The Club collects personal information in order to use it and disclose it as follows:
- (i) To know who you are, verify your age, identify you and process your membership applications and renewal;
 - (ii) Comply with requirements under the Registered Clubs Act, Corporations Act, Anti – Money Laundering and Counter Terrorism laws, Income Tax Assessment Act and other relevant legislation;
 - (iii) Comply with obligations relating to the responsible provision of gaming services,
 - (iv) 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;
 - (v) Send notices as required by the Club's Constitution, the Corporations Act, the Registered Clubs Act and or other law;
 - (vi) Analyse usage of food and services offered by the Club;
 - (vii) Provide you with goods or services you are receiving or utilising as offered by the

- Club;
- (viii) Provide any benefits you become entitled to in relation to that product or service you have received or purchased from a Club;
 - (ix) Analyse website and other online resources usage;
 - (x) Respond to your submissions, questions, comments, requests and complaints;
 - (xi) Conduct our internal business and management processes, for example accounting or auditing purposes;
 - (xii) 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;
 - (xiii) 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;
 - (xiv) 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 from our Club.; and
 - (xv) To monitor your use of the Club services and facilities.

7.4 *Illegal and Undesirable Activity*

7.5 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.

8 **Anonymity and Pseudonymity**

- 8.1 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.

9 **Third Party Disclosure**

- 9.1 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) Any organisation for any authorised purpose with your express consent.
- 9.2 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:
- (a) The Australian Taxation Office
 - (b) Australian Securities and Investments Commission
 - (c) Centrelink
 - (d) Child Support Agencies
 - (e) Australian Financial Security Authority.
- 9.3 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.

10 Cross Border Disclosure of Personal Information

- 10.1 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.
- 10.2 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:
- (a) 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 of the information that are substantially similar to the Club's Privacy Protection Principles; or
 - (b) The individual consents to the transfer; or
 - (c) 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
 - (d) 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
 - (e) All of the following apply:
 - (i) The transfer is for the benefit of the individual; and
 - (ii) It is not practicable to obtain the consent of the individual to that transfer; and
 - (iii) If it were practicable to obtain such consent, the individual would be likely to give it; or
 - (f) 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 inconsistently with the Club's Privacy Protection Principles.
- 10.3 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.
- 10.4 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.

11 Access to and correction of Personal Information

- 11.1 You can contact us and ask to view your information. 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.
- 11.2 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 can 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.
- 11.3 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.

12 Acceptance

- 12.1 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.

13 How to make a Complaint?

- 13.1 If you have a concern or complaint about your privacy, let us know and we will try to fix it, 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.
- 13.2 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.

14 Changes to Our Privacy Policy

- 14.1 The Club reserves the right to make changes to this Privacy Policy. The Club will publish any updated Privacy Policy on the Club website. If you continue to provide us with your personal information through any means after these changes have been published, you confirm your acceptance of these changes.
- 14.2 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 digital or electronic message, including without limitation email, MMS, SMS, from the Club, you may follow the directions within that material i.e. an unsubscribe link located in the communication of that marketing offer. The Club will ensure that your name is then removed from any relevant communication list. The Club does not sell your personal information to other organisations for the purposes of direct marketing.

15 Contact us - Privacy Officer

- 15.1 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 02 9830 0699, generalenquiries@workerslifestylegroup.com.au or contacting the Clubs Privacy Officer as follows:

Attention: Privacy Officer

Blacktown Workers Club Ltd

Postal Address: 55 Campbell Street, Blacktown NSW 2148

Phone Number: 02 9830 0699

Email Address: generalenquiries@workerslifestylegroup.com.au

