

PRIVACY POLICY

This Policy applies to personal information the Club collects from you:

- Via our websites;
- Via social media;
- Via telephone;
- Via email;
- Via fax;
- Via Member card activity;
- In person; and/or
- Using a POS (Point of sale terminal) to purchase goods;
- When using your membership card whilst using gaming facilities;
- Financial Transactions whilst using gaming facilities;
- In writing; and
- CCTV footage.

The Club's website collects two types of information. The first type is anonymous information. The web server makes a record of your visit and logs the following information for statistical purposes:

- The user's server address;
- The user's top level domain name (e.g. com, .gov, .net, .au, etc.);
- The date and time of the visit to the site;
- The pages accessed and documents downloaded;
- The previous site visited; and
- The type of browser used.

No attempt will be made to identify users or their browsing activities except, in the unlikely event of an investigation, where a law enforcement agency may exercise a warrant to inspect the internet service provider's logs.

Another way information may be collected is through the use of "cookies". A cookie is a small text file that the website may place on your computer. Cookies may be used, among other things, to track the pages you have visited, to remember your preferences and to store personal information about you.

The Club website uses cookies for "Session Management" to maintain data related to the user during navigation to make it easier for you to view upcoming events and member information. The Club website does not use Cookies for user tracking.

You can adjust your Internet browser to disable cookies or to warn you when cookies are being used. However, if you disable cookies, you may not be able to access certain areas of the website or take advantage of the improved website experience that cookies offer.

Our websites may contain links to other websites, web-based third parties such as social media pages including Facebook, Twitter, LinkedIn, YouTube and Ticketmaster. We are not

responsible for the privacy policies of the entities responsible for those websites and we recommend that you review the privacy policies applicable to any other websites you visit.

The kinds of information the Club may collect

From time to time you may voluntarily supply your personal information to the Club. The Club will record your e-mail address if you send us a message, subscribe to an email newsletter, or complete a form if this information is requested.

When you provide your personal information, it allows us, for example, assist you with membership enquiries, employment queries, inform you about social media campaigns/competitions and upcoming Club events and activities. You may supply personal information to the Club by, for example, responding to a survey or taking part in a competition. The Club only collects personal information that is necessary for the Club to perform its functions and/or activities.

Depending upon the circumstances you may provide to the Club and the Club may collect, information such as, but not limited to:

- your name;
- your contact details;
- your social media details (e.g. blogs, twitter, Facebook, LinkedIn);
- your inquiry or complaint details; and/or
- your feedback or evaluations of the Club and the service that the Club provides.

Identification

Where proof of identity is required for Club Membership, we may request photographic proof of your identity in the form of a State (other nationally issued) Driver's License, Australian or other nationally issued passport or an Australian state issued Proof of Age or identity card.

Where you provide information to the Club in relation to a job application, the personal information you provide will only be collected, held, used and disclosed for the purposes of considering your potential employment with the Club. Where you provide the details of referees, you confirm that you have informed the referees that you are providing their contact information to the Club and they have consented to the Club contacting them and discussing the personal information you have provided in relation to the job application.

We will collect personal information directly from you:

- unless you have consented to the Club's collection of your personal information from third parties, for example when purchasing tickets on Ticketmaster;
- when we are legally required to do so; or
- unless it is unreasonable or impractical to do so.

Where we have collected personal information about you either directly or by other means as set out above, we will notify you at the time, or as soon as practicable, to ensure that you are aware of such collection and its purpose.

You can choose to interact with us anonymously or by using a pseudonym where it is lawful and practicable. For example, you may wish to participate in a blog or enquire about a particular campaign anonymously or under a pseudonym. Your decision to interact anonymously or by using a pseudonym may affect the level of services we can offer you. We will inform you if this is the case and let you know the options available to you.

If we receive unsolicited personal information about or relating to you and we determine that such information could have been collected in the same manner if we had solicited the information, then we will treat it in the same way as solicited personal information and in accordance with the APPs. Otherwise if we determine that such information could not have been collected in the same manner as solicited personal information, and that information is not contained in a Commonwealth record, we will, if it is lawful and reasonable to do so, destroy the information or de-identify the information.

The purposes for which personal information is collected, held, used and disclosed

The Club collects, holds and uses your personal information to:

- Assist in improving our services;
- Inform you about campaigns, competitions, special offers;
- Improve our service delivery;
- Manage our relationship with you; and/or
- Conduct surveys and research.

All data collected for the above purposes will be collected and stored by the Club or by using a third party.

Direct Marketing

You consent to our use and disclosure of your personal information for the purposes of direct marketing which may include providing you with information about events, products and services.

If you do not want us to use your personal information for direct marketing purposes, you may elect not to receive direct marketing at the time of providing your personal information.

Unsubscribing and opting out -

If you no longer wish to receive direct marketing or other communications, you may request at any time to cancel your consent to such communications as follows:

- If subscribing to an email newsletter you may “unsubscribe” at any time from the newsletter mailing list;
- The Club, from time to time, sends you text messages about issues of importance such as events or promotions. You may “opt out” by texting STOP in reply to a text message from the Club; or
- You may contact us at any time by mail or email directed to the Club’s Compliance Manager who is the Privacy Officer.

Disclosure of your personal information

The Club may disclose your personal information, in connection with or to further the purposes outlined above, to:

- Mailezy mail house and other like companies;
- MaxGaming – Membership Data base and gaming operations system
- AB note
- Ticketmaster – External ticket sales
- if you have consented; and/or
- otherwise as required by law.

If any of these organisations are located outside Australia, you expressly consent to us disclosing your personal information to those organisations. These parties may be located in the following countries: Nil

We take reasonable steps to ensure that each organisation that we disclose your personal information to, is committed to protecting your privacy and complies with the Australian Privacy Principles, or is subject to a law or scheme that is at least substantially similar to the way in which the Australian Privacy Principles protect information.

By providing your personal information to the Club, you consent to us transferring your personal information to such other organisations.

How the Club holds personal information

Wherever reasonably practicable the Club holds electronic personal information on data servers that are owned and controlled by the Club. The data servers are password protected and login secured, and backup copies are maintained offsite by contracted IT service provider(s). However, by providing personal information to the Club you consent to your information being stored in and processed on a secure web based application on a data server or data servers (e.g. cloud services) owned by a third party or third parties that may be located within or outside of Australia – this is not regarded as a disclosure. The Club will take reasonable steps to ensure that any third party providers comply with the APPs. In the future, if personal information is only routed through servers located outside of Australia – this not regarded as a disclosure, and the Club's Privacy Policy will be amended where appropriate to satisfy the APPs.

Wherever reasonably practicable the Club holds physical personal information in access controlled premises, i.e. Gaming exclusion information

The Club also has CCTV throughout the premises and will hold this information/footage for a period of 28 days. This information is stored electronically in the manner as laid out above.

When the Club no longer requires your personal information for a specific purpose and we are not required to keep it to comply with any laws, we will take such steps as are reasonable in the circumstances to destroy your personal information or to ensure that the information is de-identified.

Government Identifiers

The Club will not adopt as our own identifier a government related identifier of an individual, such as a tax file number or Medicare card number and will only use or disclose a government related identifier where the use or disclosure:

- is reasonably necessary for the Club to verify your identity for the purposes of our activities or functions;
- is reasonably necessary for the Club to fulfil its obligations to an agency or a State or Territory authority;
- is required or authorised by or under an Australian law; or
- is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

How you may seek access and/or correction to personal information held by the Club

You have the right to request access to your personal information and request that it be updated or corrected. In most cases you can gain access to your personal information that the Club holds. To request access to, correction of, or updating of any personal information held about you, please write to the Privacy Officer at the following address:

The Privacy Officer and Compliance Manager
Kedron-Wavell Services Club
PO Box 107
Chermside South QLD 4032
E: privacy@kedron-wavell.com.au

General enquiries can be made via telephone by calling the following number:
P: (07) 3350 0971

The Club requires that you provide acceptable photographic proof of identity in order to seek access to your personal information (Drivers License, Passport, or State based proof of age card). The Club may charge a reasonable fee where access is provided. The Club may refuse to provide access if permitted to do so by law or under the APPs. The Club will seek to provide you with access to your personal information within 30 days of receipt of a valid request and may charge you a reasonable fee for doing so.

You should contact the Club when your personal information details change. It is important that we keep our membership records up to date. Please contact Club Reception to update your personal information.

How you may complain about a breach of the APPs

To make a complaint about an alleged breach of the APPs please write to or email the Privacy Officer at the following address:

The Privacy Officer and Compliance Manager
Kedron-Wavell Services Club
PO Box 107

Chermside South QLD 4032

E: privacy@kwsc.com.au

General enquiries can be made via telephone by calling the following number:

P: (07) 3350 0929

All complaints must be written. Please provide all details about your complaint as well as any supporting documentation to the Privacy Officer.

How the Club will deal with complaints

The Club will seek to deal with privacy complaints as follows:

- complaints will be treated seriously;
- complaints will be dealt with promptly;
- complaints will be dealt with confidentially;
- complaints will be investigated by the Privacy Officer; and
- the outcome of an investigation will be provided to the complainant where the complainant has provided proof of identity. The Club will seek to respond within 30 days of receipt of a valid complaint.

Variations to the Policy

The Club will occasionally update this Privacy Policy to reflect Club and customer feedback and or legal requirements. The Club encourages you to periodically review this Policy on our website to be informed of how the Club is protecting your information.

GAMING AND LIQUOR

Responsible Gaming is important to Kedron-Wavell Services Club Inc. Whilst the majority of people game responsibly, a small percentage of people may experience difficulties associated with their gaming behaviours.

Kedron-Wavell Services Club Inc. offers free, confidential service providing information and referrals for professional counselling.

For more information on our Financial Management Program and Self Exclusion please contact Club Reception on (07) 3359 9122.

RISK ASSESSMENT MANAGEMENT PLAN (RAMP) POLICY

The Kedron-Wavell Services Club has developed a RAMP – Risk Assessed Management Plan which is available to all Members and Guests upon request. This Plan is part of the Club's program to provide leadership in all aspects of Club service and management. The RAMP outlines our commitment to ensure that our Members and Guests are provided with a safe environment whilst they are on our premises. Kedron-Wavell Services Club has carefully developed these guidelines in accordance with Queensland Liquor Licensing Legislation. To ensure that our RAMP is effective and accountable, Kedron-Wavell Services

Club has consulted widely to develop these guidelines to our Management and Staff to assist them in understanding their roles and responsibilities in the workplace.

The RAMP informs patrons how Staff are trained in ensuring the responsible service of alcohol and that Staff training on matters of patron care is a priority for the Club.

For further information, please contact the Club's Compliance Manager on (07) 3350 0929.