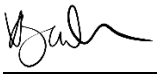
Kedron-Wavell Limited Policy

Policy Title: PRIVACY POLICY	Policy Number: COM004
Effective Date: 1 January 2026	Applicable to: Patrons and Staff
Approved Date: November 2025	Approved by: General Manager 

Privacy Policy

Kedron-Wavell Limited (the Club) is committed to the protection of personal information. In accordance with the *Privacy Act 1988* (Act) and Australian Privacy Principles (APPs), this policy details how the Club collects, uses, and safeguards personal information across all venues owned or operated by the Club.

1. Personal Information.

The personal information collected and held by the Club includes your:

- name, address, and date of birth;
- contact details e.g. phone number and email address;
- membership details and preferences including spend and service preferences;
- payment details and methods
- information provided in feedback, surveys, or correspondence;
- details required by law e.g. proof of age, ID for payments;
- digital photographs, video and audio via CCTV, Facial recognition systems and Body-worn camera's/ audio; and
- information collected through facial recognition technology in accordance with the Club's facial recognition policy.

2. Collection

Personal information is collected by a range of methods including:

- registration process for new membership or renewing an existing membership;
- participation in Club activities including events, draws, and promotions;
- transactions using inhouse systems e.g. point of sale systems, member terminals, online sales etc,
- access of Club websites, social media platforms, email and phone services including SMS;
- CCTV and audio used for safety, security, property protection and staff matters;
- applications for employment;
- image capture for biometric matching (see Facial Recognition Policy); and
- body-warn cameras used by authorised staff, when activated for safety, security, staff matters and incident management or evidentiary purposes.

3. Purpose

Personal information is used for many purposes including:

- notification about club services, benefits, and membership rewards;
- information about events, offers, and updates;
- improve services and meet customer needs as part of continuous improvement;
- administer community safety programmes i.e. Safer Gambling Programs;
- to meet all legal and regulatory obligations; and
- to support venue safety, security, incident response and lawful operational practices, in accordance with applicable policies and legal requirements.

4. Use and Disclosure

Personal information is only used and/or disclosed where it is lawful, necessary, and consistent with the purpose for which it was collected. This includes:

- member/guest benefits and related purpose that the member/guest would reasonably expect;
- where consent is provided, or where the use or disclosure is otherwise authorised or required by law;
- necessary to perform a function, deliver services, or meet legal and/or regulatory obligations; and
- for safety, security, investigation, incident management, evidentiary, insurance, or compliance purposes, including where information is obtained through CCTV, body-warn cameras, or facial recognition technology.

5. Cross Boarder Disclosure

The Club may transfer, store, or process personal information outside Australia. This is where the Club uses overseas data or website hosting services, third-party providers, or related entities located overseas. In doing so, the Club will take all reasonable steps to ensure that any overseas entity will manage information in accordance with the ACT, APPs and this Policy.

6. Protection and Security

The Club implements reasonable measures to ensure the protection and security of information including:

- storing of information on protected storage systems;
- access to information is restricted to authorised personnel only;
- regular review and updating security measures;
- periodic review of the data stored with permanent deletion where required;
- engaging only verified third parties inside and outside of Australia; and
- retaining such information only for as long as reasonably required or permitted by law and applicable policy.

7. Access and Correction

Personal information can be accessed and/or corrected by approved means including:

- direct request to a relevant staff member either in person or via phone;
- email to the Club providing details of the request;
- hardcopy e.g. written letter posted to the Club; and
- by review of electronic information e.g. promotions sent via email.

Note: the Club will attempt to provid access in accordance with the request.

8. Complaints and Process

The Club has in place an effective mechanism and procedures to resolve privacy complaints. The Club will ensure that all complaints are dealt with as soon as possible to achieve a timely outcome.

Please contact the Club regarding any concerns or to make a complaint about the manner in which the Club has collected, stored, or used personal information etc - see Contact Us.

9. Consent

You agree to the terms of this Privacy Policy if you visit the Club, use the Club website, or accept the terms of one (or more) of the terms and conditions relating to membership, entry, event, or a product or service offer by the Club.
Note: the option to out of marketing communications is available at any time.

10. Contact Us

If you have any questions about this policy or your personal information, you can contact us at:

- **Website:** https://kedron-wavell.com.au/contact/
- **Email**: info@kedron-wavell.com.au
- **Address**: 21 Kittyhawk Drive, Chermside, Qld 4032
- **Phone**: 07 3359 9122
- **Opening Hours:** from 10am seven days a week