

## **Coogee Legion Club – Privacy Policy**

**Date of Release: 1<sup>st</sup> July 2022**

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

Coogee Legion Ex-Service Club Limited (**the Club**) operates its licensed premises called “Coogee Legion Club” at 200 Arden Street, Coogee NSW 2034.

The Club also operates a website and social media associated with its licensed premises, the services provided by the Club and the Club generally.

This policy describes how we handle the “personal information” collected from members, guests and others.

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?**

The Club is committed to complying with its obligations under the *Privacy Act 1988 (Cth)* (“**Privacy Act**”) by protecting the privacy and confidentiality of your personal information and the personal information of all its members, guests and others.

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.

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

The Club collects a wide range of personal information, and in some cases sensitive information, this includes:

1. your contact details including your occupation and date of birth; and
2. 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;
3. information about what goods or services you buy or receive from the Club;
4. details of your activities in the Club, including your participation in social or sporting activities;
5. information connected to your use of our gaming machines (including your player activity statements and prizes you receive);
6. information about you related to a liquor or gaming self-exclusion or banning order about you from yourself, other clubs, ClubsNSW, a Liquor Accord, the Independent Liquor Gaming and Racing Authority or Office of Liquor Gaming and Racing;
7. things you say or do (or said about you) in connection with an incident or potential disciplinary proceedings; and
8. images or video of you at the premises.

From time to time, we may collect additional information related to specific promotions, services or activities. Wherever practicable, we will advise you of the information being collected and provide you with an opportunity to refuse the collection of 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 the observations of our staff. We collect personal information when you:

1. visit the Club;
2. apply for or renew membership of the Club or request to use our services;
3. purchase goods or services from the Club (and for example, use your membership card);
4. use our gaming machines or request to be excluded from using our gaming machines;
5. attend a function or show at the licensed premises operated by the Club;
6. plan an event to be held at the licensed premises operated by the Club;
7. participate in activities offered by the Club including competitions and promotions;
8. visit the website or social media sites operated by the Club;
9. are banned from the Club or the gaming area;
10. use your Club membership card in the Club;
11. receive or request sponsorship through programs such as ClubGRANTS;
12. are involved, witness or are connected to an incident at the Club or disciplinary proceedings of the Club;
13. complete any surveys or provide information in the Club.

We only collect personal information about you from you unless it is unreasonable or impractical to do so.

For example, it may be unreasonable or impractical to collect information from you when the information is provided by other members, our staff or government officials.

If you give us personal information about others, we ask you to tell them about this privacy policy.

As a registered club, we have a legal responsibility to collect certain information about our members and guests pursuant to the *Registered Clubs Act, the Corporations Act, Gaming Machines Act, Liquor Act, Anti-Money Laundering and Counter-Terrorism Financing Act and Work Health Safety Act*.

For example, when a person applies for membership of the Club we must collect details including their name and address. We must display this information on the club's notice board before the Board of the Club is able to consider the application for membership. If the person does not provide us with this information we cannot consider the application for membership.

Temporary members, guests of members and other visitors to the Club must produce a recognised form of identification (such as a drivers licence or passport) to gain entry into the licensed premises. If you elect to use our electronic ID scanners, we will collect the information from your ID at the time you enter the Club. More information about our electronic ID scanners appears below.

### **Why do we collect your personal information?**

We collect personal information to assist us to operate the Club and carry out certain activities and provide products and services to the members and guests of the Club. The purpose of collecting personal information is to:

1. consider application and renewals of membership; and

2. identify who comes to the Club and verify their age and address;
3. provide a safe environment for you, other patrons, visitors and our staff;
4. provide services to members and their guests;
5. carry out accounting and finance requirements and legal and administrative reporting requirements;
6. operate functions venues and hold a range of functions;
7. carry out competitions and promotions;
8. perform gaming operations;
9. publish and distribute newsletters;
10. carry out marketing (including direct marketing);
11. offer and manage sponsorships, including by supporting community sports and social events;
12. conduct elections of the Board;
13. conduct disciplinary proceedings; and
14. recruit employees; and
15. increase membership of the Club.

### **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 or when allowed under the Privacy Act.

The Club may also use the personal information we collect from you for direct marketing of products and services to you including from third party suppliers. 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 Chief Executive 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 including ClubsNSW, a Club sponsor, the Club's legal or financial advisers or to other Club members. Personal information will only be disclosed to these parties for a purpose permitted by the Privacy Act and/or this policy and your consent will first be obtained where appropriate.

We also need to disclose your personal information to third parties for the purposes of allowing us to carry out the activities listed above. For example, from time to time, the Club engages external companies to carry out mail services, IT storage services and software related services. These external companies only have access to the information necessary to provide services to the Club. They are required to comply with the Privacy Act and must offer privacy standards comparable to those offered by the Club.

We will disclose your personal information if we are required to do so by law enforcement agencies, the Australian Electoral Office, the Department of Family Services or the Australian Taxation Office.

## **FREQUENTLY ASKED QUESTIONS**

### **Is there surveillance at the Club?**

The Club conducts video and audio surveillance at the Club's premises 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 to investigate incidents and maybe disclosed to our legal representatives and law enforcements agencies.

### **Do I have to use the electronic ID scanners to enter the Club?**

No. Anyone that enters the Club has the option of signing in manually and you may simply show your ID to confirm your address and your age.

### **What information is collected from the electronic ID scanners?**

Our electronic ID scanners take a photograph of your ID and collect the information from the ID necessary for us to perform our functions.

The current version of the electronic scanners used by the Club retains the name, address and signature of members.

### **How do we hold and protect your personal information?**

Personal information that is held by the Club is stored both electronically and by hard copy.

The Club takes reasonable steps to ensure that your personal information is safe and secure from unauthorised use and disclosure whether such information is stored electronically or in hard copy.

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

### **Are we likely to disclose personal information overseas?**

The Club uses overseas secure cloud storage services. Information is disclosed to this facility for the purposes of storage. This constitutes a disclosure under the Privacy Act.

### **Using the Club's Website and Social Media**

2. The website and social media operated by the Club may collect personal information for the purposes outlined in this privacy policy. They may also use cookies.
3. Any information collected as a result of your use of the website operated by the Club will be handled in accordance with this privacy policy.

The website and social media operated by the Club may contain hyperlinks to other websites including those operated by third parties.

The links are provided for reference only. The Club does not have any control over these external websites. The Club is not responsible for the content on these sites or the privacy practices adopted by these sites.

### **What does this policy mean?**

By attending the Club or participating in an activity at the Club, you consent to the terms of this policy.

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

If you do not agree to any part of this policy or do not wish to receive direct marketing information from the Club, please contact the Chief Executive Officer.

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

You can request access the personal information we hold about you by contacting the Club's Chief Executive 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 in a reasonable time frame (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 we may be unable to give you access to your information. If we are not able to provide access to your information we will provide you with our written reasons.

If you believe any of the personal information that we hold about you is incorrect you can ask us to correct it.

If asked to correct your personal information we will take reasonable steps to correct the information to ensure that it is accurate, up to date, relevant and not misleading. If we refuse to correct your personal information we will give you written reasons.

### **How do I make a complaint about privacy at the Club?**

If you believe we have breached the Privacy Act or any of the Australian Privacy Principles or if you want to raise any issues you may have about privacy at the Club, please contact the Club's Chief Executive Officer.

In making a complaint to the Club about privacy, please give us enough details to be able to provide identify your concerns and response appropriately. You must provide us with your name and contact details and a description of your complaint. We will respond to you in a reasonable time frame (usually not more than 30 days). If you are unhappy with how we handle the complaint you have a right to take the complaint to the Information Commissioner.

### **How do I contact the Chief Executive Officer at the Club?**

You can contact Ms Gail Patrin (the Club's Chief Executive Officer) by:

Phone: (02) 9665 5151

Email: [admin@coogeelegionclub.com.au](mailto:admin@coogeelegionclub.com.au)

Post: Coogee Legion Club, 200 Arden Street, Coogee NSW 2034