

# Privacy Policy

## Overview

Eastern Suburbs Leagues Club Limited (referred to as “we”, “us” and “the Club”) recognises the importance of protecting the privacy of personal information collected from you. This Privacy Policy sets out how the Club protects the privacy of the personal information we hold about our patrons, potential patrons, contractors and others in accordance with the Australian Privacy Principles. The Club is bound by the Australian Privacy Principles contained in the Privacy Act 1998 (Cth).

## What is personal information?

In summary, 'personal information' is information or an opinion relating to you which can be used to identify you or by which your identity can be reasonably identified.

## Why do we collect personal information?

The Club collects personal information so that we are able to effectively market and provide you with the goods and services that we supply, and to also ensure we meet our legal obligations.

## Employee records

The Australian Privacy Principles do not apply to employee records. As a result, this policy does not apply to the Club's treatment of employee records, where the treatment is directly related to a current or former relationship between the Club and an employee.

## What information do we collect?

The types of personal information that we collect will depend on the circumstances of collection and the kind of service that you request from the Club. We are required to collect personal information such as your full name, postal and delivery address, date of birth, occupation, contact details, proof of your identity and Club membership details. When you use the internet, we collect information which you submit as well as information relating to the pages on websites that we operate which you visit.

## How do we collect your personal information?

Personal information is generally collected during the course of our relationship with you. We may collect personal information about you when you deal with us over the telephone, send correspondence, through surveys, closed circuit television, visit the website that we operate or through personal contact. There may be occasions when we collect information about you from a third party, such as from a database provided to us, and wherever reasonably

possible, we will take all steps necessary to advise you we have done this and the reason for it.

## **Sign-in Data Retention**

The Registered Clubs Act and Liquor Act require clubs to collect various information from patrons. This may include the patron's full name, address, signature and partial date of birth. It is therefore appropriate for clubs to collect this information from a license by using an ID scanner. This information is stored securely as required by law.

## **How we use your personal information?**

We use the personal information that we collect to provide our services to you, to fulfil administrative functions associated with these services, for example billing, to enter into contracts with you and/ or third parties and for marketing and client relationship purposes.

When we collect your personal information, we will give you the option of advising us that you do not want us or any third party to use the information for any disclosed secondary purpose. You may also at any later date notify us of your preference on this issue by contacting our WHS, Risk & Compliance Manager (see below for contact details).

## **Will personal information be disclosed to third parties?**

Unless otherwise stated, we may disclose your personal information to third parties who assist us in providing services or who perform functions on our behalf for example Government Agencies, mailing houses, ticketing agencies, specialist consultants, clients of the Club, and contractors who provide certain services to us. We or they may use your personal information to assist in supplying and improving products and services made available to you and also providing you with goods, services or promotions which may interest you and bringing these to your attention. Your information may also be shared between related companies within the Club's corporate group. If we provide your personal information to a third party, we will generally require that party to protect your personal information in the same way that we do.

The Club is not likely to send personal information outside Australia.

## **Access to and correction of information we hold about you**

We will on request provide you with access to the personal information we hold about you in accordance with the Australian Privacy Principles. We may recover our reasonable costs from you in supplying you with access to this information. If we decline to give you access in certain circumstances, we will provide you with reasons for this. To request access, please contact our Privacy Officer WHS, Risk & Compliance Manager (see contact details below).

## **Ensuring your personal information is up to date**

We will take reasonable steps to ensure that your personal information is accurate, up to date and complete whenever we collect or use it. You may contact us at any time to update your personal information or to tell us that the information is inaccurate or incomplete.

## **Security**

We will take all reasonable precautions to safeguard your personal information from loss, misuse, unauthorised access, modification or disclosure. We use a variety of physical and electronic security measures including restricting physical access to our offices, firewalls and secure databases.

## **Closed Circuit Television and Photographs**

We use closed circuit televisions (CCTV) at certain locations throughout our premises (e.g. entries and exits) and surrounding areas. The CCTV is integral to our security system and CCTV images are stored for a minimum "retention period" of at least twenty-one (21) days unless a reportable incident is identified. In such cases, the Club will archive such images and retain the footage (for the period leading up to, during and following the incident) for a minimum period of seven (7) years after the retention period unless provided to the relevant authority i.e. NSW Police or Liquor and Gaming Inspectors for investigation purposes or in instances where public liability is involved. The Club must also archive CCTV footage if requested by the relevant authority. Where no incident has been identified, the CCTV footage is automatically deleted within thirty (30) days after the retention period.

We may take photographs of you attending our premises, and we may wish to use them for marketing and advertising purposes. Unless you advise us otherwise, you expressly agree and consent to the use of any photographs, which may include you, for the aforementioned purposes, without compensation.

## **Online Privacy Issues**

To the extent that the other sections of this Privacy Policy apply to online privacy issues, they form part of the terms of use for any website operated by us. This section of the Policy provides information specifically relating to websites operated by us.

### **(a) Online collection of personal and aggregated data**

We will collect personal information from websites operated by us where you register for e-mail bulletin services, chatrooms, supporter bulletin boards, register as a member or purchase goods or services through the website. We will use this information for providing the relevant service to you and in other ways described in this policy.

We may also collect other information when you access a website operated by us (some of this is personal information and some of it is not) to optimise our goods and services including our web pages for your computer. This information will include the identity of your internet browser, the type of operating system you use, your IP address and the domain name of your internet service provider.

This information is aggregated for reporting purposes. Personal identifiable characteristics are removed and users remain anonymous unless you have provided express consent to us to recognise your usage. This data is gathered by us to examine the internet trends and demographics and to assist in improving websites operated by us, and may be provided to third parties for marketing and research purposes.

### **(b) Cookies**

To enhance your experience with websites operated by us, many of our web pages use "cookies". Cookies are text files that a website transfers to your computer's hard drive for record keeping purposes. Websites operated by us use cookies to support your current

activity on the website by providing a unique identifier in order to allow our web server to distinguish your web browser from any other web browser accessing the website, and to customise the website for you. They also allow us to follow usage patterns and compile data that may help us improve the website and target advertising. Cookies by themselves do not tell us your e-mail address or other personal information. However, once you choose to provide the website with personal information, this information may be linked to data stored in the cookie.

You should adjust the settings in your web browser if you do not want information collected through the use of cookies. However, this may slow down or restrict access to parts of the web site.

#### (c) Links to other websites

The websites operated by us may contain links to third party websites, being advertisers, sponsors or other companies that we have a relationship with. Although a website may be linked to a website operated by us, we are not responsible for the privacy practices of the linked website. Any concern that you may have in relation to privacy policies of a linked third-party website should be directed to the operator of that website.

#### (d) Online disclosures

From time to time we may have relationships with other companies that we allow to place advertisements on web pages of websites operated by us. As a result, when you visit a website operated by us, advertising server companies may collect information such as your domain type, IP address and clickstream information.

#### (e) Public forums

Websites operated by us may make chat rooms, forums, message boards and/ or news groups available to you. Any information through these channels becomes public information and you should exercise caution in disclosing personal information. Whenever you disclose personal information through these channels, this information can be collected and used by others.

#### (f) Promotional e-mails

If you are receiving promotional e-mails from us and you no longer wish to receive this information, please e-mail us and we will ensure that you no longer receive this information.

### **What is a Commonwealth identifier?**

A Commonwealth identifier is a Commonwealth Government or Commonwealth Government agency designated identification number such as a tax file number or Medicare number. We do not use Commonwealth identifiers to identify personal information we have collected from you.

### **Do I have to be identified at all?**

Whenever it is lawful and practical to do so, you may transact with us without providing personal information. This may however impact on the level of service we can provide to you.

### **Does my personal information leave Australia?**

We do not envisage that we will transfer your personal information to any persons or corporations outside Australia. If it becomes necessary to do so, we will only do so if the recipient of the information is subject to the laws that are equivalent to the Australian Privacy Principles.

## Sensitive Information

Sensitive information can be information about your racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional trade or association, membership of a trade union, sexual preferences or practices, criminal record or health.

We will not usually collect sensitive information. However, if we do, it will usually be for the purposes of providing our goods and services. We will seek your consent to collect sensitive information if required by the Australian Privacy Principles.

## Security of your personal information online

Generally, e-mail is not a secure way to communicate and you should be aware of this when sending personal information to us by e-mail.

## Changes to this Privacy Policy

We may amend this Privacy Policy from time to time as our business requires or as the law changes.

## For further information

Please contact our WHS, Risk & Compliance Manager (at the below contact details) to ask for access or correct your personal information, if you have a complaint concerning the privacy of your personal information or if you would like more information.

Contact details	WHS, Risk & Compliance Manager Eastern Suburbs Leagues Club Ltd 93-95 Spring Street Bondi Junction NSW 2022 Telephone: <b>(02) 9386 3200</b> Fax: <b>(02) 9387 7779</b> E-mail: <a href="mailto:info@eastsgroup.com.au">info@eastsgroup.com.au</a>
Issue Date	November 2020

## Staff use only

Further Information	WHS, Risk & Compliance Manager and People & Culture Department
Policy Changes	Approved by the Group CEO
Review Date	November 2022

I, \_\_\_\_\_ (print full name), acknowledge that I have read and understood the guidelines outlined in this Privacy Policy and agree to accept these guidelines as a condition of my employment at the Club and return this declaration to the People & Culture Department.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date