

PRIVACY POLICY

BankstownSports

Privacy Policy

Bankstown District Sports Club Ltd (ABN 88 000 243 916) ("**we**", "**us**", "**Bankstown Sports**" or the "**Club**") is committed to the protection of your Personal Information and our obligation to comply with the Australian Privacy Principles that form part of the Privacy Act 1988 (Cth) ("**the Act**").

This Privacy Policy document describes how we manage and handle the Personal Information of our members, guests and visitors ("**you**" or "**your**"). It contains information about how we collect, store, disclose and use your Personal Information. It includes how you can correct or request access to your Personal Information and how you can make a complaint if you have concerns regarding how Bankstown Sports has managed your Personal Information.

If you would like more information, please refer to the 'Contacting Us' section of this document.

Scope of this Policy

This Policy applies to Personal Information collected by Bankstown Sports, its controlled entities, websites and App, when collecting, storing, disclosing and using Personal Information relating to an individual. This *Privacy Policy* does not apply to the Personal Information of Bankstown Sports employees, suppliers and contractors.

This document is designed to be read in conjunction with the Bankstown District Sports Club Ltd *Website Terms of Use*. By using our Website or App, you agree and consent to the terms of this *Privacy Policy* and our *Website Terms of Use*. If you would like more information, please refer to the 'Contacting Us' section of this document or visit our website for our *Website Terms of Use* (<http://www.bankstownsports.com/policies-regulations>).

Bankstown Sports is a 'reporting entity' under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and also handles Personal Information for the purposes of, or in connection with, its obligations under that Act and the AML/CTF Rules in conjunction with the Australian Privacy Principles. This Policy is supplemented by additional collection notices we may provide at or before the time we collect Personal Information.

What is Personal Information?

Personal Information, as per the *Privacy Act 1988 (Cth)*, includes information or opinion about an individual that is identified or reasonably identifiable.

This information may include:

- Name and date of birth;
- Residential and business postal addresses, telephone/mobile/fax numbers and email addresses;
- Bank account and/or credit card details for agreed billing purposes;
- Any information that provided to us during your Member profile creation process or added to your profile over time;
- Purchase history and venues you visit within the Club;
- Details regarding incidents you are involved in or other engagement with the Club (such as feedback, complaints, market research responses, correspondence, etc);
- CCTV images, Body Camera images/audio and Facial Recognition images captured with our surveillance infrastructure and equipment;
- Biometric information about you including your photograph or facial biometric information or other information collected from scanning identification documents;
- Your vehicle and/or vehicle number plate;
- Your exclusion or self-exclusion status and other accompanying information;
- Source of wealth, occupation, inter-customer relationships, 'Know your Customer' due diligence information and other information relevant to our obligations under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)* or Liquor & Gaming guidelines;
- Association with an associated Sporting or Community club
- Information used to prevent or detect fraudulent activity; and
- Any information you otherwise share with us or is shared with us relating to the above.

How we may collect your Personal Information?

We generally collect Personal Information that is necessary for us to conduct our business as a registered Club in NSW. In some instances, such as *AML/CTF Act 2006 (Cth)* compliance processes, we may also collect Personal Information from third parties to enable us to more effectively perform our duties.

We may collect Personal Information that you provide to us about yourself when you:

- Enter and/or 'sign' into a venue
- Apply for membership, become a member or renew membership
- Enter a competition or promotional activity
- Utilise our Website or App, including information added to your user profile
- Purchase a product or service or otherwise use Credit and EFTPOS Card facilities.
- Request to receive products or services, including completing competition, survey, voting or loyalty program forms and questionnaires
- Provide information to us through marketing or community engagement forums
- Provide information to us during or regarding incidents you or others are involved in
- Provide information to us in the form of feedback, complaints, correspondence, discussion or other engagement with Club employees
- Provide information to an associated Sporting or Community club regarding Membership of a Bankstown Sports associated venue
- Book or make a reservation for an event, restaurant service or other Club offering
- Enter a Gaming area, restricted area or area subject to entrance conditions.

We are subject to the sign-in obligations outlined in the *Registered Clubs Act 1976 (NSW)* and *Registered Clubs Regulation 2015 (NSW)* and as such require individuals attending the Club to provide identifying information. To simplify this process, we scan a visitor's identity card (driver's licence, photo-card, passport or pension card) or provide an option for details to be manually entered into our system. When you become a member or when you update your membership details, we are required to collect contact details that are held in a membership database that is safe and secure. This information is not used for any purpose other than our need to comply with applicable legislation/regulation or as set out in this agreement.

By entering our Venues, we consider visitors, customers, members and guests to be consenting to CCTV, Facial Recognition and other Surveillance technologies collecting Personal Information and our subsequent use of that information.

CCTV images, Body Camera images/audio and Facial Recognition images are captured with our surveillance infrastructure and equipment at various locations, in various instances, on premises. These are used expressly to facilitate Bankstown Sports' compliance with our regulatory obligations to comply with the *AML/CTF Act 2006 (Cth)*, *Liquor & Gaming* guidelines, Responsible Gaming responsibilities, Duty of Care obligations and for security purposes.

We will collect biometric and 'Know Your Customer' Personal Information to the extent that it is reasonably necessary for the Club to meet our regulatory obligations (including AML/CTF compliance, liquor banning orders, harm-minimisation exclusions, financial-crime related exclusions, security and safety duty of care obligations, and other licencing obligations). The Club will adopt a risk-conscious, proportionate and conservative approach to the collection, use and retention of this information to support ongoing compliance. Any unsolicited 'Know Your Customer' information received by the Club may be used where relevant to our Customer

Due Diligence obligations and will then be assessed to determine whether continued retention is reasonably necessary. Similarly, biometric information that does not result in a potential or actual match will be deleted as soon as reasonably practicable. In general, we will endeavour to retain Personal Information for as long as it is needed for the purposes for which it was collected or as required by law. The Club will adopt a risk-conscious, proportionate and conservative approach to the retention of data.

When a membership card is used in a gaming machine, swipe machine or at a point-of-sale outlet, the information is used to award 'Membership Rewards' and is cross referenced with our membership database. This information, in a consolidated manner, is used to help make decisions on changing or improving our service offerings.

We may collect transaction information related to the use of our services, including the type of services requested or provided, order details, payment transaction information (such as a restaurant's name, location and amount of transaction), delivery information, date and time the service was provided, amount charged, distance travelled, and payment method.

Any payments or purchases that are made through our Website and point-of-sale are processed securely and externally by one/or more third party payment gateway providers.

In some instances, you may desire to remain anonymous. We will make every effort to assist with such a request, however we may not be able to provide this capability if we are authorised or obliged to identify an individual to a degree dictated by law, regulation or legislation. If you wish to remain anonymous, you must advise us, however note that this may limit the products and services that we are able to offer you.

We collect Personal Information about you via data matching activities conducted by us or by third party service providers to verify information or comply with our regulatory obligations.

We may collect Personal Information from additional sources, such as law enforcement, regulatory bodies or other individuals in response to an incident, complaint or feedback.

We may collect Personal Information during the provision of service on behalf of external parties, such as local Council, when operating external surveillance infrastructure or other mechanisms of gathering Personal Information. In these instances, Bankstown Sports will engage solely as the operator under accountability structures specific to each individual agreement. If you would like more information, please refer to the 'Contacting Us' section of this document.

When using the website or the App we also collect Internet Protocol (IP) addresses in some circumstances. The Club collects and manages IP addresses as part of the service of providing internet session management and for security purposes. The Club may also collect and use web log, computer and connection information for security purposes and to help prevent and detect any misuse of, or fraudulent activities involving, our website or the App.

Our Website and our App may use "cookies" to help personalise your online experience. A cookie is a text file or a packet of information that is placed on your device by a web page server to identify and interact more effectively with your computer. You can configure your internet browser to accept all cookies, reject all cookies or notify you when a cookie is sent. Please refer to your internet browser's instructions to learn more about these functions. Most web browsers automatically accept cookies, but you can usually modify your browser settings

to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of our Website.

Our website and App may use cookies to:

- remember your preferences or recognise you as logged in while you remain so
- facilitate e-commerce transactions or to ensure that your order is remembered between pages during the checkout process
- manage the signup process when you create an account with us;
- show relevant notifications to you (such as notifications that are relevant only to users who have, or have not, created an account or subscribed to newsletters or email or other subscription services); and
- remember details of data that you choose to submit to us (such as through online contact forms).

Many of these cookies are removed or cleared when you log out, but some may remain so that your preferences are remembered for future sessions.

In some cases, third parties may place cookies through our website or the App.

- Google Analytics, one of the most widespread and trusted website analytics solutions, may use cookies de-identified data about how long users spend on our website or the App and the pages that they visit;
- Google AdSense, one of the most widespread and trusted website advertising solutions, may use cookies to serve more relevant advertisements across the web and limit the number of times that a particular advertisement is shown to you; and third party social media applications (eg, Facebook, Twitter, LinkedIn, Pinterest, YouTube, Instagram, etc) may use cookies in order to facilitate various social media buttons and/or plugins in our website or the App.

How may we use your Personal Information?

Bankstown Sports may use and disclose your Personal Information that we collect for several different reasons, including to:

- Verify your identity, verify your details, contact you or otherwise manage our relationship with you
- Maintain security and safety at our Club
- Provide Responsible Gaming and other harm minimisation services
- Provide our services to you, including administering our Membership Program
- Communicate targeted and non-targeted updates, offers, events, competitions, surveys, promotions and other information to you. These communications may be via email, text messages, push notifications, in-app communications, ads, letters, printed media, community-facing media and verbally
- Improve your customer experience
- Facilitate charging, billing, collecting debts and other purchase related functions
- Make changes to or personalise your account
- Respond to any queries or feedback that you may have

- Comply with our Anti-Money Laundering or Counter-Terrorism Financing or Liquor & Gaming compliance obligations. This may include utilising software with Artificial Intelligence functionality.
- Prevent and detect any misuse of, or fraudulent activities involving, the Club or other probity checks
- Gain an understanding of your Personal Information and communication needs or obtain your feedback or views about our products and/or services in order for us to improve them.
- Maintain and develop our business systems and infrastructure, including testing and upgrading of these systems,
- Perform necessary operations to maintain our services, including to troubleshoot software bugs and operational problems; and/or to conduct data analysis, testing, and research;
- Monitor and analyse Website and App usage and activity trends,
- Analyse wholistic and individual data and data trends, both manually and with the support of artificial intelligence and machine learning interfaces.
- Provide customer support, including to investigate and address member concerns and to monitor and improve our customer support responses and processes
- Investigate or address claims or disputes relating to use of Club services, to satisfy requirements under applicable laws, regulations, or operating licenses or agreements, or pursuant to legal process or governmental requests, including from law enforcement
- For any other purpose reasonably considered necessary or desirable by the Club in relation to the operation of our business. This may include utilising software with closed-system Artificial Intelligence functionality.

The distribution of promotional and marketing media is intended to keep you informed of products, services, and special offers we believe you will find valuable and may continue after you cease acquiring products and services from us. If you would prefer not to receive promotional or other material from us, please let us know and we will respect your request. You can unsubscribe from such communications at any time if you choose.

Surveillance, Body Camera, CCTV and Facial Recognition (including biometric) information are utilised to:

- Facilitate compliance with our Responsible Gaming, Responsible Service of Alcohol and other harm minimisation initiatives (such as exclusions and self-exclusions)
- Facilitate compliance with our Anti-Money Laundering and Counter-Terrorism Financing obligations.
- Validate identity and membership
- Ensure a safe and security environment

We do not use Facial Recognition Technology or biometric information for marketing purposes or for non-regulatory purposes. Generally, we use and disclose your Personal Information only for the purpose for which it was collected (the primary purpose), for a related secondary purpose you would reasonably expect or where you have consented. We may also use or disclose your Personal Information where this is required or authorised by law, including under the AML/CTF Act and the AML/CTF Rules. In meeting these obligations, we will act within the confidentiality provisions of the AML/CTF Act and Privacy Act, which may limit the information we are able to disclose to you.

When we may disclosure your Personal Information

Bankstown Sports understands the importance of maintaining the privacy of Personal Information. We commit to using and disclosing Personal Information solely for the purposes we collected and instances where you would reasonably expect information to be used and disclosed as per this agreement.

In order to deliver the products and provide the services you require or for the purposes set out in this document, the Club may disclose or transfer your Personal Information to other organisations associated with, are located within or owned by the Club (eg: your Personal Information may be deemed necessary to provide Member Rewards benefits at an internal restaurant within a Venue). The Club will take all reasonable steps to ensure that these organisations are bound by confidentiality and privacy obligations in relation to the protection of your Personal Information or have private and confidential aspects of your information obscured or redacted. As a member of the Club, you consent to the Club disclosing or transferring your personal information to entities associated with or owned by the Club in accordance with this agreement.

When you acquire or access any other goods or services from a third-party through our website or the App, we will provide to that party such information as is necessary to enable it to process and administer your order.

To the extent permitted by law or we are obligated to by law, regulation or legislation, we may also disclose or allow the disclosure of information to:

- Bankstown District Sports Club Ltd's associated and controlled entities;
- Identification, security, probity and other similar providers;
- Responsible Gaming and other harm minimisation-related providers or services;
- Government and regulatory bodies;
- Law enforcement agencies or as part of legal proceedings;
- Third parties who provide services from time-to-time for Bankstown Sports to facilitate mail or marketing distribution, research agencies, debt collectors or advertisers, as outlined in other sections of this document.

We may also disclose Personal Information, on occasion, in response to claims or incidents to protect against activity that would be reasonably suspect to be illegal or fraudulent.

Marketing and other promotional communications may be disclosed as above. This is performed in instances when you have consented to receive such information or it is related to the reason Personal Information was initially obtained. You may contact Bankstown Sports at any time to update your marketing and communication preferences, as well as utilise unsubscribe facilities included on marketing communications.

Security of Personal Information

We are committed to maintaining the confidentiality of the Personal Information that you provide us and we will take all reasonable steps to protect against loss, unauthorised access, interference, use, disclosure, modification and other misuse.

Your Personal Information is held on secure servers or stored in controlled local environments. Some information is housed offsite or offshore using trusted third-party providers. Our Employees and third-party service providers are required to maintain the confidentiality of any Personal Information held by Bankstown Sports and take reasonable steps to ensure Personal Information is handled in accordance with the Australian Privacy Principles.

Data security safeguards include:

- Data security and data handling protections, physical and digital safety measures
- IT System security (such as firewalls, intrusion detection, system surveillance, encryption, anti-virus, etc)
- Physical security mechanisms
- Staff training and other procedures that form part of our Risk Management framework
- Data destruction or data de-identification when the Personal Information is no longer necessary for the purpose for which it was collected (subject to satisfying any legal, accounting, regulatory or reporting requirements) as per the Australian Privacy Principles.

In addition to the safeguards described above, our security measures include multi-factor authentication and role-based access controls for systems that hold Personal Information, regular software patching, access logging and monitoring, and contractual controls requiring any third-party service providers to protect Personal Information and notify us of any suspected data breach.

Data Breaches

We maintain a data breach response plan so that we can respond quickly to any actual or suspected data breach. If a data breach is likely to result in serious harm to any individual whose Personal Information we hold, we will notify the affected individuals and the Office of the Australian Information Commissioner (OAIC) as soon as practicable if relevant to do so. Where a data breach involves Facial Recognition Technology, we will also notify Liquor & Gaming NSW as soon as practicable if relevant to do so.

Accessing and Amending your Personal Information

In most cases, you may request access to the Personal Information that we hold about you. We will handle requests for access to your Personal Information in accordance with the *Privacy Act 1988 (Cth)* and any other relevant legislation or regulation.

All requests for access to your Personal Information must be directed to the Privacy Officer by email or by writing to us at our postal address included in the 'Contacting Us' section of this document.

All requests for Personal Information will be subject to strict verification of your identity and will be made available within a reasonable timeframe unless we are precluded to the provision due to a point of legislation or regulation. We will inform you in advance if the search or provision of Personal Information will incur a fee or cost.

We will endeavour to amend any Personal Information about you that is held by us and that is inaccurate, incomplete or out of date if you request for us to do so. If we disagree with your view about the accuracy, completeness or currency of a record of your Personal Information that is held by us, and you ask us to associate with that record a statement that you have a contrary view, we will take reasonable steps to do so, however may elect to not update that data set.

In some circumstances, you may ask us to delete your data, this will be assessed and actioned subject to satisfying any legal, accounting, regulatory or reporting requirements.

In some circumstances, you may request that we deal with you anonymously or by pseudonym. These requests will be assessed and actioned subject to satisfying any legal, accounting, regulatory or reporting requirements. Individuals will have an option to deal anonymously or by pseudonym unless impracticable or we are required or authorised by law to accurately identify you.

To ensure that your Personal Information is accurate and up to date, please promptly advise us of any changes to your information by email at hello@bankstownsports.com or in person at a Concierge Desk or via an address included in the 'Contacting Us' section of this policy. This change may be subject to an identity verification process.

Contacting Us

If you would like more information related to this Privacy Policy or about the way we manage Personal Information, please contact our Privacy Officer via:

- By Email:
Attn: Privacy Officer
compliance@bankstownsports.com
- By Post:
Attn: Privacy Officer
Bankstown District Sports Club
PO Box 213
Bankstown NSW 1885.

Complaints

We take our obligations pursuant to the *Privacy Act 1988 (Cth)* seriously and if individuals wish to complain about a breach of the *Privacy Act 1988 (Cth)*, they may submit their complaint in writing to Bankstown Sports using the above address. All complaints should include as much detail as possible, include the reasons the individual says Bankstown Sports has breached the *Privacy Act 1988 (Cth)* and all other relevant particulars.

Upon receiving a written complaint, Bankstown Sports will endeavour to acknowledge receipt of the complaint in writing as soon as is reasonably practicable. Bankstown Sports will investigate the complaint and provide a response within a reasonable timeframe from the date of receipt. All complaints will be handled sensitively and with every effort to maintain the privacy of individuals involved.

BankstownSports

BankstownSportsBowls

BaulkhamHillsSports

AuburnTennisClub

BirrongSports

TheAcresClub

BankstownGolfClub

8 Greenfield Parade, Bankstown NSW 2200
BankstownSports.com