

White Eagle House
Policy May 2025

Contents

1. We respect your privacy	2
2. What personal information we collect	2
3. How we collect your personal information	2
4. Use of your personal information.....	3
5. Scanners and government identifiers.....	4
6. CCTV.....	5
7. Disclosure of your personal information overseas.....	5
8. Security of your personal information	5
9. Access to and correction of your personal information	5
10. Complaints about privacy and access refusal.....	6
11. Changes.....	6
12. When you visit our website	6

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Privacy Policy

1. We respect your privacy

- 1.1 White Eagle House (**the Venue**) respects your right to privacy and this policy sets out how we collect and treat your personal information.
- 1.2 “Personal information” is information we hold which is identifiable as being about you.

2. What personal information we collect

- 2.1 We may collect the following types of personal information from you:
 - (a) name;
 - (b) phone number;
 - (c) information about the Venue’s goods or services you have been supplied with;
 - (d) information from enquiries you have made;
 - (e) communications between us and you;
 - (f) credit card information;
 - (g) email address;
 - (h) date of birth;
 - (i) Club membership details and history;
 - (j) sporting competitions you have entered;
 - (k) trade promotions you have participated in;
 - (l) information required to be included in gaming/alcohol/AML/CTF registers.
- 2.2 In some instances we may collect “sensitive information”, for example:
 - (a) information about your health or disabilities for the purpose of playing sport;
 - (b) people who work with children at the Venue are required to have a working with children check; and
 - (c) employees and Board Members may be required to provide police checks.

3. How we collect your personal information

- 3.1 We collect your personal information by extracting information from a variety of sources, including:
 - (a) membership applications and renewals;
 - (b) electronic or personal interaction with us;
 - (c) when you access our website;

- (d) when we provide goods and services to you;
 - (e) when you use your membership or loyalty program cards at the Venue;
 - (f) entry forms for trade promotions, loyalty programs and sporting competitions;
 - (g) documents, including scanned copies of government identifiers (eg drivers licences), from which we obtain information we are required to collect to comply with our:
 - (i) Responsible Service of Alcohol Policy;
 - (ii) Responsible Service of Gambling Policy;
 - (iii) AML/CTF Program; and
 - (iv) laws regarding admission of guests and authorised gaming visitors;
 - (h) information provided directly by employees and Board Members; and
 - (i) CCTV footage.
- 3.2 When we use the visitor-sign-in scanners to scan your drivers licence, we collect from the drivers licence only the information we are required to collect under the Liquor laws, which is:
- (a) Name;
 - (b) Address;
 - (c) Date of entry; and
 - (d) Signature.
- 3.3 Unless you are a Club member, patrons cannot be admitted to the Venue unless we collect the information in clause 3.2.
- 3.4 Our visitor-sign-in scanners black-out all identifying information other than the information in clause 3.2.
- 3.5 Membership and loyalty card scanners record all the information that is on the cards.
- 3.6 We might ask you for other information when you enter our venue, eg your phone number. Provision by you of that other information is optional.
- 3.7 We take reasonable steps to ensure that your personal information is secure.

4. Use of your personal information

- 4.1 We use your information to:
- (a) provide goods and services to you;
 - (b) comply with our legal obligations including under the following legislation:
 - (i) Liquor Control Reform Act;
 - (ii) Gambling Regulation Act;
 - (iii) AML/CTF Act;
 - (iv) Associations Incorporation Reform Act or Corporations Act; and

- (v) Public Health and Wellbeing Act; and
 - (c) comply with the rules of the peak sporting bodies we are associated with;
 - (d) conduct our loyalty programs and provide you with the benefits of those programs;
 - (e) send you direct marketing material from the Venue only when you have agreed to receive it and have not opted out;
 - (f) improve our services and to notify you of opportunities that we think you might be interested in; and
 - (g) contact you regarding unclaimed gaming winnings, lost property, incidents at the Venue.
- 4.2 We do not provide your information to third parties, except when required by:
- (a) police and other law enforcement agencies;
 - (b) VGCCC personnel;
 - (c) VLC personnel;
 - (d) AUSTRAC;
 - (e) Sporting bodies for the purposes of the Club’s sporting teams; and
 - (f) our business partners who assist us in the provision of our services and who must handle the information in accordance with the Privacy laws.
- 4.3 Due to the requirements of the legislation governing our operations, the Venue cannot provide for anonymity and pseudonymity when you deal with us.
- 5. Scanners and government identifiers**
- 5.1 Our visitor-sign-in scanner system is operated by Circle, **(the scanner-provider)** which provides cloud-based storage of the data, and which adheres to its own Privacy Policy regarding that data.
- 5.2 The information collected by the “visitor-sign-in scanner” and for KYC processes under our AML/CTF Program is kept for at least for 12 months or longer as required by:
- (i) the VLC,
 - (ii) AUSTRAC, which requires 7 years, &/or
 - (iii) the VGCCC, which is generally 3 years.
- 5.3 If you object to, or cannot, have your government identifier (eg drivers licence) scanned, you can complete the sign-in register by hand, and allow us to verify it by sighting acceptable documentation.
- 5.4 Information collected by our visitor-sign-in scanners is:
- (a) kept on our computer server and in the cloud based storage of the scanner-provider;
 - (b) is kept in password protected computer files accessible only by Venue’s management staff and personnel of the scanner-provider;
 - (c) is not retained on our system any longer than required by the various

legislation; and

- (d) is manually deleted from our systems when we are no longer required to keep it under the relevant legislation.

6. CCTV

6.1 We use CCTV footage to:

- (a) discharge our duty to ensure the safety of all staff, members and guests and other persons who enter our venue and sporting facilities;
- (b) meet our duties under our RSA and RSG codes of conduct and AML/CTF program, copies of which are available on request;
- (c) ensure that self-excluded or banned persons do not enter or remain in areas from which they are excluded or banned;

6.2 It is mandated by law that gaming venues record and store CCTV footage for a minimum of 28 days. It is a condition of entry into our venue that entrants consent to their image being captured, viewed and used for the purposes set out above.

6.3 No earlier than 28 days after collection, images collected by CCTV automatically expire and are not assessable on expiration, unless they are required to be kept for a lawful purpose.

7. Disclosure of your personal information overseas

We do not disclose your personal information to overseas recipients.

8. Security of your personal information

8.1 We take reasonable steps to protect your personal information from unauthorised access. However, we are not liable for any unauthorised access to this information.

8.2 We destroy or de-identify your personal information when it is no longer required for the purpose we collected it – see discussion above.

9. Access to and correction of your personal information

9.1 Generally, you can access your personal information by contacting the Venue Manager whose contact details are listed below. We may charge a reasonable administration fee for this access.

9.2 We may refuse you access to your personal information in the following circumstances:

- (a) giving you access would pose a serious threat to the life, health or safety of any individual or to public health or public safety; or giving access would have an unreasonable impact on the privacy of other individuals;
- (b) the request for access is frivolous or vexatious;
- (c) the information relates to existing or anticipated legal proceedings;
- (d) giving access would prejudice negotiations we are having with you;
- (e) giving access would be unlawful;
- (f) giving access would impede an investigation into serious misconduct or

suspicious matters; or

(g) giving access would reveal material that is commercially sensitive for the Venue.

9.3 We will respond to any request for access to personal information within a reasonable time and if we do not give you access, we will tell you why.

9.4 We provide access to personal information to only:

(a) the person to whom it relates; and

(b) persons or organisations which have a legal right to access.

10. Complaints about privacy and access refusal

10.1 If you have any complaints about our privacy practices or being denied access to your personal information, you should send details of your complaints to the Venue's Manager. We take complaints very seriously and will respond promptly (usually in less than 30 days) after receiving written notice of your complaint.

10.2 If you are still unsatisfied you can refer your complaint to the Information Commissioner at www.oiac.gov.au.

11. Changes

11.1 We review this Privacy Policy from time to time and we may change this Privacy Policy in the future. If you would like to make comments about our Privacy Policy, please direct them to the Venue's Manager.

11.2 Revised versions of the Privacy Policy will be uploaded onto our website, so please check back from time to time.

12. When you visit our website

12.1 When you come to our website we may collect certain information such as browser type, operating system, websites visited immediately before coming to our site, etc. This information is used in an aggregated manner to analyse how people use our site, so we can improve our services.

12.2 As is very common, we may use cookies on our website. Cookies are very small files which a website uses to identify you when you come back to the site and to store details about your use of the site. Cookies are not malicious programs that access or damage your computer.

12.3 Our site has links to other websites not owned or controlled by us. We are not responsible for these sites or the consequences of you going to those sites.

Contact Details:

General Manager is Jacqueline Bisby

Venue Name White Eagle House

Address: __46-48 Fellmongers road Breakwater 3219

Telephone: _03 5229 1009 Email: manager@whiteeaglehouse.com.au