Seaford RSL

PRIVACY POLICY

Effective Date July 2025

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PRIVACY POLICY

This Privacy Policy outlines how we at Seaford RSL collect, use, store, and protect your personal information in the course of our venue operations. We are committed to managing your information responsibly and in accordance with the *Privacy Act 1988 (Cth)* and the *Australian Privacy Principles (APPs)*.

1. Why We Collect Personal Information

We collect your personal information to:

- Verify your identity
- Process payments (including via Electronic Funds Transfer – EFT)
- Meet venue regulatory, licensing, and responsible gambling obligations
- Assist in the enforcement of venue bans or exclusions
- Ensure the safety and integrity of the venue's gambling operations
- Manage loyalty or rewards programs (when applicable)
- Manage and administer loyalty, membership or rewards programs, including recognising your visits to the venue, providing personalised benefits, and notifying you of relevant offers or promotions (when applicable).
- Comply with lawful obligations under relevant gaming, liquor, and privacy laws

2. What We Collect

The types of personal information we may collect include:

- Full name
- Date of birth
- Residential address
- Contact details (email, phone)
- Occupation and employment details
- Bank account details (for EFT payments, where applicable)

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- Source of funds/wealth when required to comply with lawful obligation
- Identification documents (e.g., driver's licence, passport, pension card)
- Gaming activity history (such as prize payments)
- Loyalty, membership or rewards programs participation (when applicable)
- Additional information provided voluntarily through the loyalty, membership or rewards programs (if applicable), such as anniversary dates, favourite sporting teams, or other interests, which help us offer more personalised experiences and promotions*.
- Credit card information for membership payments (if applicable)
- CCTV footage within venue premises
- Facial images (where Facial Recognition Technology is in use)

** For more information about how we manage personal information under the rewards program, please refer to the venue's Rewards Program Terms and Conditions (if applicable).*

3. How We Collect Your Information

We may collect your personal information through:

- Verbal and written communication with staff
- Identification presented when requesting cheque/EFT payments
- Gaming room forms and payout documentation
- Loyalty, membership or rewards programs participation (when applicable)
- CCTV footage
- FRT systems
- Digital interactions (e.g., online bookings, Wi-Fi login, surveys)
- Reasonable inquiries made by venue staff in line with compliance protocols
- Verification of identity documents using authorised government sources, including relevant state or territory licensing agencies, where permitted by law.
- Open-source searches (e.g., publicly available information) conducted in line with Anti-Money Laundering (AML) obligations to determine additional information about patrons where required.

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All information is gathered, recorded, and verified using venue-owned documentation and controlled devices to maintain data security and ensure compliance with internal protocols.

4. Facial Recognition Technology (FRT)

Our venue uses Facial Recognition Technology (FRT) to enhance safety, ensure compliance with self-exclusion programs, and support harm minimisation initiatives. The use of FRT is strictly aligned with the principles of privacy, transparency, and compliance with the **Privacy Act 1988 (Cth)** and the **Australian Privacy Principles (APPs**).

- FRT analyses facial features of individuals entering specific areas of our venue. This analysis is conducted in temporary memory and only for the purpose of identifying matches against predefined databases, such as self-excluded individuals or banned patrons.
- No biometric data is stored or retained after the analysis. If no match is found, the data is automatically purged from memory in real-time.
- At no point is the facial data linked to an individual's identity unless a match occurs, and even in those cases, no biometric template is retained by our systems.
- All facial data processed by FRT is held in temporary memory only, for the sole purpose of conducting real-time comparisons. This data is not stored in any database or retained after processing. Data is securely managed and protected under privacy legislation.
- Individuals are informed about the use of FRT via clearly visible signage at venue entry points. Additional information about the use of FRT is available in this privacy policy and upon request.

5. Use of Personal Information

We use your information for purposes including:

- Verifying your identity for gaming-related transactions
- Processing payments via EFT, where required
- Managing self-exclusion, banned or re-entry processes
- Ensuring compliance with licensing and operational regulations
- Improving venue operations and customer safety
- Supporting internal training, audits, and compliance reviews

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- Processing credit card information for membership payments (if applicable)
- Contacting you if necessary to verify information or resolve issues
- Meeting obligations under Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF) legislation, including conducting open source searches and due diligence inquiries.
- Administering and personalising loyalty or rewards programs (where applicable), including using voluntarily provided details such as anniversaries or favourite sporting teams to tailor your experience.
- Fulfilling regulatory reporting requirements, such as providing information on cheque and EFT payments to the VGCCC.
- Facilitating transactions and services provided by third parties such as Tabcorp and Keno.

6. Storage and Security

Your personal information is securely stored in physical and/or electronic form. Access is restricted to authorised staff.

CCTV footage is maintained for a minimum period of 28 days, or longer where required by the conditions of our liquor licence.

All data is retained in accordance with applicable legal retention requirements (typically up to seven years for certain records such as payment forms and ID verification documents). Appropriate security controls are in place to prevent loss, misuse, or unauthorised access to your data.

7. Disclosure of Information

We will only disclose your personal information:

- When required or authorised by law (e.g., Gambling, Privacy, or Liquor legislation)
- To law enforcement, courts, or regulators when legally compelled
- To external contractors and service providers who assist with venue operations, provided they adhere to confidentiality obligations
- Internally, to relevant venue management, for the purposes outlined in this policy

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- Where applicable, to Tabcorp, Keno and its related bodies corporate for the purpose of facilitating their wagering and transactional services.
- As part of regulatory reporting obligations, such as declaring cheque and EFT payments to the Victorian Gambling and Casino Control Commission (VGCCC).

We do not share your personal information with third parties for marketing purposes without your consent.

8. Access and Correction

You have the right to request:

- Access to the personal information we hold about you
- Correction of any inaccurate or outdated information

Requests should be made in writing to the venue directly. Refer to our Contact section on our webpage https://seafordrsl.com.au/

9. Making a Complaint

If you have concerns about how your personal information is managed, please contact the venue's Privacy Officer. If you are not satisfied with our response, you may escalate your complaint to the **Office of the Australian Information Commissioner (OAIC)** at www.oaic.gov.au.

10. Contact Us

Refer to our Contact section on our webpage - https://seafordrsl.com.au/

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