

Privacy Policy

1. INTRODUCTION

This Privacy Policy outlines the commitment of Geelong Combined Leagues Club Ltd, trading as Buckley's Entertainment Centre, (**Buckleys**) to complying with Australian privacy laws.

The Policy applies to members, visitors and suppliers. It explains how we collect, use, store and protect personal information in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**) and the *Australian Privacy Principles (APPs)* made under the Privacy Act. This Policy does not apply to the personal information of Buckleys employees or contractors.

The Policy also contains information about how you can access the personal information Buckleys holds about you, how you can ask us to correct your personal information and how to make a complaint.

This version of Buckleys' Privacy Policy came into effect as of 18th June 2024. **Your continued use of our services on or after that date will be taken to constitute acknowledgment and acceptance of this Privacy Policy.**

2 DEFINITIONS

Personal Information has the meaning given under the Privacy Act, being:

"information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion".

For example, name, address, telephone number, age, gender identity, financial information, education history, and employment details.

Collection means the act of gathering, acquiring, or obtaining personal information from various sources, including directly from individuals, through employment processes, or via workplace technologies.

Use means the handling, employment, application, utilisation, or management of personal information within the organisation for specific purposes.

Disclosure means the release, transfer, sharing, or provision of access to personal information to entities outside the organisation.

Data Quality means the accuracy, completeness, and currency of personal information held by the organisation.

Security of Personal Information means the measures and protections put in place to safeguard personal information from unauthorised access, misuse, interference, loss, modification, or unauthorised disclosure.

Access means the ability of individuals to request and obtain a copy of their personal information held by the organisation.

Correction means the process of updating, amending, or rectifying inaccuracies in personal information held by the organisation.

Monitoring means the activity of overseeing or supervising the use of information and communication technologies by employees to ensure compliance with organisational policies.

Compliance means adherence to laws, regulations, guidelines, and specifications relevant to the organisation's operations and policies.

3 POLICY

3.1 PURPOSE OF COLLECTION

Buckleys will collect personal information solely for compliance with legal obligations and for legitimate business purposes.

These purposes include:

- promoting and selling to you, and giving you access to, our products or services;
- developing a stronger relationship with you and facilitating interactions between us;
- processing and managing your membership, profile and accounts (including to assist you with operational requests such as resetting your password);
- learning of your likely preferences so that we may personalise our services, send you news about Buckleys and notify you of services, special offers, surveys, competitions and other information and opportunities you may be interested in;
- performing accounting and administrative functions (including invoicing and processing of payments);
- meeting regulatory and contractual requirements;
- internal reporting;
- preventing, detecting and investigating or otherwise addressing any use of our products or services and/or your information for illegal or suspected illegal activities (including payment fraud or identity fraud);
- preventing, detecting and investigating or otherwise addressing any security or technical issues with our products and services;
- enforcing our terms and conditions of use;
- protecting our property and preserving or exercising our legal rights;
- protecting against harm to the rights, property or safety of Buckleys, users of its products and services, or the public, as required or permitted by law;
- as part of advertising campaigns;
- responding to your enquiries and investigating your complaints;
- communicating with you in relation to any of these matters and other topics; and
- if we have collected personal information from you, or from a third party, as a result of your participation in a self-exclusion scheme (such as the Victorian Gaming Self Exclusion Program), your personal information will only be used for the purposes for which it was collected and as has been notified to you.

3.2 TYPES OF INFORMATION COLLECTED

Collection of Personal Information

The type of personal information we collect from or about you depends on your interaction with us and may include some or all of the following:

- your name, title, gender, date of birth and identification details (e.g. passport, driver's licence or other identification details) which may include your image;
- contact details such as your home and postal address, telephone number and email address;
- payment details such as credit or debit card number and expiry date;
- CCTV images captured on our premises;
- our interactions with you such as any feedback, complaints, claims you have made, records of any correspondence and interactions with us and our staff; and
- information used to prevent and detect fraud: an assessment of whether your transaction is potentially fraudulent, including the historical and other information used by our service provider to make this assessment.

Depending on the circumstances, if we do not collect your personal information, we may not be able to provide you with our services or grant you access to certain parts of our premises.

Collection of sensitive personal information

Sensitive personal information is information or an opinion about an individual's racial or ethnic origin, political opinions or memberships, religious beliefs or affiliations, philosophical beliefs, sexual preferences, criminal record, health information, genetic information or membership of a trade union.

Buckleys' general approach is not to collect, use or disclose sensitive information. However, in limited circumstances, we will collect sensitive information from you where it is necessary for one of our functions or activities and you have consented to the collection of that information, or the collection is required or authorised by law e.g. if you were to request or access medical assistance.

3.3 METHOD OF COLLECTION

Information will be collected in a manner that respects individual privacy, either directly from individuals or through legal and fair means.

Information we collect from you directly

Most of the personal information we collect and hold about you we obtain from you directly, in the following ways:

- when you contact or interact with us to make enquiries, to make a complaint, or to provide feedback;
- when you register for an account, create a profile or apply for membership with us to use any of our services or join a loyalty program we offer;
- if you interact with us via social media (such as Facebook, X);
- if you subscribe to any of our mailing lists, request us to send you information or set your account preferences;
- if you participate in any competition, promotion, or survey group that we conduct;
- when you attend one of our events; and

- when you communicate or deal with us in other ways involving a need for personal information to be provided by you directly.

Facial recognition technology

Upon entering Buckleys premises, all visitors will have their image taken by a camera at the entrance of the Club.

Buckleys uses Ottica AI Facial Recognition Technology that allows for gambling venues to administer self-exclusion agreements. The facial recognition surveillance system identifies at-risk individuals and alerts staff to ensure the individual is refused entry into the gaming room.

The technology may also be used for other lawful purposes such as recognising individuals on the Liquor Accord Banning List, or who are wanted by the police. The Privacy Policy of Ottica AI can be accessed at the link: [Privacy – Ottica AI](#)

The images taken by the facial recognition system are processed on-site and not sent externally. The images are not retained or saved anywhere, due to a self-destruct feature within the system that automatically erases all facial recognition data.

The system does not track or retain information about individuals who are not included in the database.

All images captured by the facial recognition system are tagged as anonymous, unless they are registered in the database.

Information we collect automatically:

Some of the information we collect about you is automatically provided to us whenever you view our website, social media pages or use our apps, and when you visit other websites on which we advertise. We collect aggregated information which tells us about visitors to our sites, but not the identity of those visitors. This includes:

- Standard browser and web server log information.
- Information collected using cookies, web beacons and similar technologies (such as browser storage and plugins) which store small data files on your device when you browse and use websites and online services.
- Via a resettable device identifier (“advertising identifier”) on your mobile device or tablet.

You may be able to disable some of these technologies by configuring the appropriate settings on your device, for example, blocking cookies.

Information from other sources:

We may sometimes collect your personal information from other sources, including:

- from other entities who, in common with us, have a relationship with you (this may include identity and fraud checking services, credit reporting bodies);
- payment service providers who provide us with payment information, or updates to that information;
- online and offline data providers from who we obtain marketing mailing lists and other commercially available aggregated demographic, interest-based and online advertising related data; and
- publicly available information sources, such as public archives, data and information repositories, publicly circulated news items and public posts on social media platforms (such as Facebook).

Collection from public sources and collection from, or disclosure to third parties

Where relevant, Buckleys will collect personal information (including sensitive information) about you from a publicly available source (such as other websites), as well as from law enforcement, government or regulatory bodies. We collect from, or disclose your personal information (including sensitive information) to, third parties, including:

- banks;
 - credit agencies and related service providers;
 - third parties in order to undertake identification, security and probity checks which may include digital verification, politically exposed persons checks, sanctioned persons checks and adverse media checks;
 - government agencies and regulators;
 - law enforcement bodies; and
 - any third parties that provide services to us.
-

3.4 USE OF INFORMATION

Personal information will only be used for the purposes for which it was collected, unless consent is given for its use in other manners.

We will only use or disclose personal information that we hold about you:

1. for the primary purpose for which it was collected;
2. for any other purpose for which you have provided us with your consent or that you would reasonably expect; or
3. where compelled or permitted by Australian law, by order of a court/tribunal, or at the direction of a law enforcement or other government agency.

The primary purposes for which we (or our related bodies corporate or contractors) collect, hold, use and disclose your personal information are in connection with carrying on our business activities and performing our functions. These purposes include:

- to identify and contact you and manage our relationship with you;
- for marketing purposes: to tell you about things at Buckleys that you may be interested in (such as updates, offers, events and competitions) via newsletters and other communications;
- to manage and administer our services to you, including where applicable, your participation in our membership programs;
- to conduct and improve our businesses and improve the customer experience;
- to provide responsible gaming services;
- to maintain security and safety in our venue;

- to prevent or investigate any actual or suspected misconduct, fraud or unlawful activity;
- verifying your credit worthiness, including to obtain a credit report about you;
- to consider any concerns or complaints you may raise;
- to comply with our legal obligations as required by relevant laws, regulations and codes of practice; and
- to perform identification, security, and probity checks.

Direct marketing

Where applicable, Buckleys will use your personal information to contact you via mail, SMS, email, telephone or online to tell you about news, special offers, products and services that you might be interested in. We do this where you have consented to receiving such information or it is related to the purpose for which we collected your personal information. You can contact us to update your marketing preferences at any time and we will include an unsubscribe facility on all marketing communications sent to you.

Surveillance

For the safety and security of all staff and guests, all persons' movements within and around our venue may be subject to video monitoring by security and surveillance systems, including CCTV and facial recognition technology. Details of suspected or actual illegal or improper conduct may be shared with regulators and law enforcement bodies.

3.5 DISCLOSURE

We will use and disclose your personal information for the purposes we collected it, where you would reasonably expect us to. We will also disclose your personal information when:

- you agree to the disclosure; or
- the disclosure is required or authorised by law.

To the extent permitted by law, we may also disclose information about you to:

- identification, security and probity check providers;
- government agencies and regulators as part of our regulatory obligations; and
- law enforcement bodies.

We may also disclose your personal information to respond to complaints and claims, and investigate and protect ourselves and third parties against any activity that we reasonably suspect to be illegal or fraudulent.

Personal information will not be disclosed to third parties without consent, except where required by law or for the purposes of carrying out the legitimate business functions for which the information was collected.

3.6 SECURITY OF PERSONAL INFORMATION

Buckleys takes steps to protect the personal information it holds against loss, interference, unauthorised access, use, modification or disclosure and against other misuse.

We will take such steps as are reasonable in the circumstances to protect any personal information we hold about you (including both paper and electronic records) from:

- a. misuse, interference and loss; and
- b. from unauthorised access, modification or disclosure.

For example, Buckleys seeks to ensure that personal information held by or for us:

- in electronic form, is stored on secured servers in controlled facilities;
- as a hard copy document, is archived in secure filing systems; and
- is only accessible by authorised personnel.

Where we no longer need the personal information we hold about you, we will take reasonable steps to securely destroy that information or to ensure that the information is de-identified in accordance with legal requirements for retention and disposal.

3.7 ACCESS and CORRECTION

You have the right to request access to, and correction of, personal information about you held by Buckleys.

We will respond to any request by you for access to your personal information within a reasonable period after the request is made (but in any event by no later than 30 days after the date you make the request) and will endeavour to give you access to your information in the manner which you have requested, if it is reasonable and practicable for us to do so.

Requests for access to or correction of your personal information must be made in writing to Buckleys' Privacy Officer.

We will give you access to any personal information we hold about you, upon your request, except to the extent that:

- a. we reasonably believe that 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
- b. giving access would have an unreasonable impact on the privacy of other individuals; or
- c. the request for access is frivolous or vexatious; or
- d. giving access would be unlawful; or
- e. denying access is required or authorised by or under an Australian law or a court/tribunal order; or
- f. we have reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to our functions or activities (including use of our products or services) has been, is being or may be engaged in and giving access would be likely to prejudice the taking of appropriate action in relation to the matter; or
- a. giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
- j. giving access would reveal evaluative information generated within Buckleys in connection with a commercially sensitive decision-making process.

If we refuse to give you access to your personal information for one of the reasons listed above, or to give you access to your information in the manner which you have requested, we will issue you a written notice setting out:

- i. the reasons for our refusal (except to the extent that, having regard to the grounds for the refusal, it would be unreasonable for us to do so); and
- ii. the mechanisms available to you to complain about our refusal; and
- iii. any other relevant matter prescribed by Privacy Law.

If you object to our refusal, you may make a complaint.

If we hold personal information about you which we are satisfied is inaccurate, out-of-date, incomplete, irrelevant or misleading, or which you request us to correct, we will take reasonable steps to correct that information and, if requested by you, to provide notification of that correction to any other entity that we have previously disclosed your information to, unless it is impracticable or unlawful to do so.

3.8 DATA RETENTION POLICY

To comply with applicable laws and regulations, we are committed to retaining personal information only for as long as is necessary for the purposes for which it was collected, or as required by law.

3.9 DISCLOSURE TO OVERSEAS RECIPIENTS

Under *APP 8 — cross-border disclosure of personal information*, before an APP entity discloses personal information about an individual to a person (the overseas recipient):

- who is not in Australia or an external Territory; and
- who is not the entity or the individual;

the entity must take such steps as are reasonable in the circumstances to ensure that the overseas recipient does not breach the APPs.

Buckleys does not disclose personal information overseas.

4 CONTACT INFORMATION AND COMPLAINTS

For questions or concerns regarding this policy, please contact our Operations Manager, Zoe Symons, zoe@buckleys.com.au 035248 4866.

Buckleys will promptly respond to all queries and complaints.

The Australian Information Commissioner is responsible for regulating the Privacy Act. If you are not satisfied with Buckleys' response to your query or complaint, or if we do not respond to you within 30 days of the date you lodge a request or make a complaint, then you may contact the Office of the Australian Information Commissioner:

Website: www.oaic.gov.au

Phone: 1300 363 992

5. POLICY ACCESS AND AMENDMENTS

Buckleys Privacy Policy can be found on our website.

We may update the Policy from time to time in response to changing legal and operational requirements.

Privacy Collection Notice - Facial Recognition

This Collection Notice sets out how Geelong Combined Leagues Club Ltd, trading as Buckley's Entertainment Centre, (**Buckleys**) uses, collects and discloses the personal information that it obtains from facial recognition technology.

The Notice is provided to you as part of complying with our obligations under the *Privacy Act 1988* (Cth) and the 13 Australian Privacy Principles (APPs) set out under that Act.

It is a condition of entry that your image will be scanned by the facial recognition camera.

Legal requirements to collect information and purposes for collection

Buckleys is legally required to collect certain personal information and sensitive information.

In Victoria it is mandatory for every gaming venue operator to have a voluntary self-exclusion program for customers and Buckleys uses facial recognition technology to comply with its obligations under that program.

Facial recognition technology is used to identify, exclude or remove individuals who may lawfully be denied access to Buckleys' premises. We may also use facial recognition technology for other purposes relating to compliance, safety, security and preventing illegal or undesirable activities.

How personal information is collected

Upon entering Buckleys premises, all visitors will have their image taken by a camera that is visible at the entrance of the Club.

Buckleys uses Ottica AI Facial Recognition Technology to identify at-risk individuals and alert staff to ensure the individual is not allowed entry or is removed from the venue.

The Privacy Policy of Ottica AI can be accessed at the link: [Privacy – Ottica AI](#)

The images taken by the facial recognition system are processed on-site and not sent externally. The images are not retained or saved anywhere, due to a self-destruct feature within the system that automatically erases all facial recognition data.

The system does not track or retain information about individuals who are not included in the database.

All images captured by the facial recognition system are tagged as anonymous, unless they are registered in the database.

Self Exclusion

For individuals who have registered for voluntary Self Exclusion, Buckleys 'uses' (by collecting, recording, storing, using and disclosing) your personal information and sensitive information (including your name, date of birth, image and address) to process, manage and enforce your Self Exclusion and to communicate with you.

Buckleys collects from and discloses your personal information and sensitive information to third parties including: Victoria Police, CCV, ASIC, the Victorian Gambling and Casino Control Commission; and any third parties that provide services to Buckleys relating to your exclusion.

If you do not agree to the 'use' of this information, Buckleys will be unable to carry out its obligations under the Self Exclusion program.

Contact information

For questions or concerns regarding this Notice, please contact our Operations Manager, Zoe Symons, zoe@buckleys.com.au 035248 4866.

Our Privacy Policy is available on our website www.buckleys.com.au

Buckleys will promptly respond to all queries and complaints.