



## Privacy Policy

This is DOOLEYS Lidcombe Catholic Club Ltd (DOOLEYS) privacy policy setting out our commitment to protecting and dealing properly with your personal information and to meeting our requirements under the *Privacy Act* and the *Australian Privacy Principles*.

We respect the privacy of your and others' personal information. We do not provide your personal information to third parties simply for their own commercial use.

We publish this policy on our website and also within our venues, so that you can be aware of when we might be collecting personal information about you.

### 1. INFORMATION THAT WE COLLECT

We collect personal information on most individuals who deal with us or who access our website or interact with us through social media. That includes information about members and their guests and other individuals who are members or patrons of any of our venues or who attend a function at any of our venues; about individuals who are themselves (or who are employees of) suppliers, consultants and contractors who deal with us or otherwise provide services or advice to us; and about individuals in other organisations who have oversight over us or any of our operations.

The kinds of personal information that we collect can include – names; residential, email, and other addresses; telephone numbers; social media participation details; gender; age; interests; other types of information or opinions about individuals that is within the definition of “sensitive information” under the privacy legislation such as information concerning health or medical matters, racial or ethnic origin, political opinions or memberships, religious beliefs or affiliations, memberships of other organisations, criminal records; occupation; PINs or passwords that you may use in connection with your interactions with us; preferences and sensitivities; details from drivers licences and other forms of identification that are produced to us; credit savings and debit card details; details of points of contact with the club; photographs taken by us or others, with or without disclosure, including photographs taken within our venues or at any activity associated with the club; live or recorded CCTV or video or audio; facial and other biometric information; location or activity information including location or activity information derived from the use of computers or mobile devices; and details of activities with or within the club or dealings with the club (including gaming activities).

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That is not an exhaustive list. For example, we sometimes need to collect additional information to authenticate you, or to better assist us to interact with you – to give just one example, to obtain your preferences for a function booking.

Where we collect biometric information (including facial images used for identification), we will take additional steps appropriate to the sensitivity of that information, including transparency measures and safeguards consistent with OAIC guidance.

We do not collect personal information unless it is reasonably necessary for or directly related to our functions or activities or the security of our operations.

We will not collect sensitive information about you without your consent (which will be implied where you choose to provide the information, or you choose to deal with or interact with us where sensitive information might be obtained as outlined in this policy) – except where that is otherwise permissible under the privacy principles.

## **2. COLLECTION CHANNELS**

We collect your personal information directly from you in many ways indicated by the provisions of this policy, including – through membership applications and details of updates and changes; booking or registration forms; use of membership and players/rewards cards and other forms of identification to obtain entry to a venue or participate in gaming or other activities in a venue; use of membership and rewards cards and other forms of identification in connection with any transaction with us or within any of our venues; sports/gym/function/booking registrations and other forms; sign in registers; credit savings and debit card information from credit savings or debit card transactions; and bank details from cheques or online payments.

We also collect your information automatically or indirectly whenever you view our websites, social media pages, use of our apps, or through recording equipment within our venues. That may be automatically collected through cookies, web beacons, and other browser storage and plugins, observations by club staff, equipment used at point of entry, surveillance equipment used within our venues, and gathering information collected by sub clubs. Some personal information may be collected by our staff creating or adding to particular records to record incidents, observations or opinions.

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We may receive unsolicited information about you from others or where others contact us about you, or in connection with an exclusion scheme or allegations of problem behaviour.

We may also collect personal information from publicly available sources of information or from others with whom we deal in connection with you including (if you are a member or proposed member, or if you are a proposed supplier, consultant or contractor, or someone having oversight over our activities), others who may put you forward or speak about you.

It is usually not practicable for us to remind you at each point or time of interaction, that personal information is being collected. If you choose to deal with us in any of the circumstances outlined, then you must be aware that your personal information may be collected.

### **3. VERIFICATION AND IDENTIFICATION**

In almost all cases where we collect personal information it would be impracticable for us to deal with you if you didn't identify yourself or used a pseudonym. So we usually do not offer you the option of not identifying yourself or of using a pseudonym.

In many cases, if you are not prepared to provide personal information or allow us to collect personal information in our usual way then we will not be able or may not be prepared to deal with you or you may not be able to exercise particular rights or enjoy particular benefits or we may not be able to provide you with the level of service normally offered. In most cases that will be because the transaction or interaction (or our proper management of the transaction or interaction) will depend on you supplying personal information. In other cases, if you are not prepared to provide personal information or allow us to collect personal information in our usual way, then it will not be practicable for us to make a special case for you and change our systems to avoid collecting other personal information concerning you.

If we receive personal information about someone that we did not solicit or seek (either directly or by facilitating the provision of that information to us) then within a reasonable period after receiving the information we aim to destroy the information or ensure the information is de-identified.

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## **4. INTEGRITY AND SECURITY OF PERSONAL INFORMATION**

We store personal information in a number of different ways and in a number of different places including – digital records at initial points of contact; physical records generated at the point of a transaction (including cash register dockets); physical records maintained at our various premises; digital records at on-site equipment and also off-site servers in the cloud not only in Australia but possibly elsewhere. Where personal information is stored or processed using cloud service providers, we take reasonable steps to ensure appropriate security controls are in place (including access control and encryption where appropriate).

We endeavour to take reasonable other steps including in relation to physical and digital security, to generally better secure our operations including our records of personal information and to protect the confidentiality of information that we hold and limit access only to employees with a reasonable need to know.

Personal information collected by us is likely to be made available to, and accessible and acted on, by most employees and some contractors in the course of our operations and activities. It is an essential condition of their employment or engagement that employees and contractors only access or use information held by the club, in confidence and for the reasonable purposes of club operations. There are many circumstances likely to arise where personal information about you could be discussed or actually or by implication disclosed, in the course of our operations and activities. Just one example is the possibility of the announcement of your name inside one of our venues. Another is where you might be recognised and identified in the presence of others either because of your identity or because of some circumstance of yours.

Whilst we do not assume any extra general or special duty of care, we may also act on – and actually or by implication disclose – some of your personal information, in taking steps of a benevolent nature in connection with you or others or in dealing with others who reasonably appear to us to have your interests at heart, and do so without first referencing you. In that we make judgements and take steps, that possibly you do not appreciate.

We cannot absolutely guarantee the physical or digital security of a particular record. While we take security steps ourselves you should also be aware that many information security risks exist and there is also always the general risk of unauthorised, unintended or accidental disclosure. Those risks include the possibility of malicious hacking or other unauthorised access. You should take

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appropriate care to help safeguard yourself and your information, including against the consequences of unexpected disclosure.

If we become aware of a serious data security breach then we will act on that breach including where applicable, applying the Australian Information Commissioner’s Guide for data breach notification.

## **5. USE AND DISCLOSURE OF PERSONAL INFORMATION**

We will only use or disclose personal information that we hold for the primary purpose for which it was collected - consistent with and as apparent from the other provisions in this policy; any other purpose for which you have provided express or implied consent; or where compelled or permitted by Australian law, order of a court or at the direction of a law enforcement or government agency.

The primary purposes for which we collect, hold, use and disclose that personal information what is already apparent from the other provisions of this policy, including – implementing, recording and managing our transactions and interactions with our members, patrons, employees, contractors, suppliers and other contacts; by way of business records for the management and administration of our operations; for marketing analysis and promotional purposes; to meet our numerous legal compliance and other obligations including reports to and filings with ASIC and other bodies; for benevolent considerations and actions that we may determine appropriate from time to time, in relation to anyone we deal with; to meet commitments, obligations or processes under conduct codes and the like that we reasonably choose or are required to follow - including the *Club Gaming Code of Practice* that applies to us as a member of ClubsNSW or commitments connected with our membership of any local liquor accord; to meet the identification and registration requirements applicable under the clubs legislation; to identify, verify and check on those we deal with; in the application of our internal processes for dealing with members including disciplinary processes; to report to members, in annual or other reports or notices of meetings or at meetings, including to keep members generally apprised of certain matters concerning the club; to internally and externally publicise club activities, initiatives and proposals – including obtaining and maintaining public internet and social media presences and a digital identity; and to be and demonstrate that we are a good corporate citizen including by reporting on activities connected with us.

Our commitments under that *Club Gaming Code of Practice* or general benevolent steps that we may choose to consider or take, may include disclosing

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some of your personal information to persons who reasonably appear to us to be members of your family or to those involved in administering or enforcing the Code or to others who reasonably appear to us to have your interests at heart.

Sometimes one of those various circumstances also may involve providing your personal information to third parties (but only within Australia) including - outside organisations who provide services or advice to us in relation to any of the types of matters listed above including consultants and contractors and printers and publishers, and also professional and other advisers, but only for them to use for purposes otherwise outlined in this policy and not for their own commercial use.

We are a public company and in limited circumstances we can have a legal obligation to allow others to look at our Register of Members.

We may also disclose your information to one or more other registered clubs in relation to an amalgamation or proposed amalgamation and to other venues in relation to exclusion or self-exclusion from venues.

We may also voluntarily or under compulsion disclose your information to police or regulatory authorities, including to meet our legal obligations.

If you provide personal information to us or deal with us in a way that leads to the collection of personal information as outlined in this policy, then we presume your consent to deal with the information in accordance with this policy and as can be reasonably anticipated in light of what is in this policy. However, we will not use sensitive information about you for the purposes of direct marketing unless the circumstances have made it clear that you specifically consent to that.

Where we use your personal information for direct communication with you for promotional purposes, we will take reasonable steps to allow you to give notice opting out for future periods and you have that right to opt out.

## **6. CHOICE TO OPT OUT IN PARTICULAR CIRCUMSTANCES**

In some situations where you are dealing with us, you may have the opportunity to opt out of providing particular personal information such as by not choosing to use a member or player or reward card within the club, in situations where we have not made that mandatory for compliance purposes or where we determine that the provision of particular information is not needed by us in the particular circumstances.

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If you are a member, there are certain materials such as notices of meeting that we are obliged to send to you and while you continue as a member you cannot opt out of those.

## **7. ACCESS TO, AND CORRECTION OF PERSONAL INFORMATION**

If we have accurate personal information about you, it enables us to provide you with the best possible service.

We take reasonable steps to keep your personal information that we have collected, accurate. That involves – making any correction that becomes apparent to us as necessary, acting on updates from you, and also making any correction under the process outlined below.

You have a right to access your own personal information that is held by us to the extent we are required to give you access under the privacy legislation and privacy principles and subject to the limitations directly or necessarily arising under the legislation or principles. We may apply a reasonable administrative charge for providing that access.

You also have a right to receive gaming machine player activity statements to the extent that we are required to provide those under the gaming machines legislation.

We will respond to requests for access and correction within a reasonable time and will take reasonable steps to verify identity before providing access or making corrections.

## **8. RETENTION OF PERSONAL INFORMATION**

We normally keep personal information indefinitely as it is difficult to identify any particular time when particular personal information ceases to be relevant and also because many of our records are aggregated and continuous.

However, to the extent of personal information that is obtained in connection with a register of guests who enter our premises where the register is required under the clubs legislation, and which information forms part of a register (which may include identification information such as drivers licence details), we will usually not maintain a particular register entry beyond about three years after the date of the entry in the register except where we have a reasonable basis for anticipating that the particular register may still be needed in evidence at some later time.

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When personal information is no longer required, we take reasonable steps to destroy or de-identify it, unless we are required or authorised by law to retain it.

## **9. APP GUIDELINES**

We apply the Australian Privacy Principles Guidelines issued by the Australian Information Commissioner, as we administer this policy and particularly in relation to matters that are not specifically addressed in this policy.

## **10. PRIVACY ENQUIRIES AND COMPLAINTS**

Our executive with the day-to-day responsibility for administering this policy is our Privacy Manager who operates from our John Street, Lidcombe premises but has that role across all of our activities and venues.

You may request access or player activity statements by contacting our Privacy Manager by email: [privacy@dooleys.com](mailto:privacy@dooleys.com) Telephone: 02 87456100

If you establish to our reasonable satisfaction that any of your personal information that you access is incorrect then we will promptly make the appropriate correction in our records.

If you have any complaint about any aspect of our dealing with your personal information, you may make that complaint to our Privacy Manager who will promptly investigate to see whether your personal information has been dealt with properly under this Policy.

We will provide you with a written response to your complaint promptly after we have completed our investigation. Any response that we provide is provided on a confidential basis however and without admission.

From time to time, we may amend this policy. The policy applicable at a particular time is the most current policy published by us at the time and it applies to all personal information that we then hold. If you have a concern to know the very latest version of this policy then you should check with the Privacy Officer.

The contact details for DOOLEYS' Privacy Officer are:

The Privacy Officer  
 DOOLEYS Lidcombe Catholic Club Ltd  
 24 John Street Lidcombe NSW 2141  
 Telephone: 02 8745 6100  
 Email: [privacy@dooleys.com](mailto:privacy@dooleys.com)

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