

Canberra Labor Club Group Privacy Policy

Canberra Labor Club Limited which includes the Canberra Labor Club, Central Social Club, Ginninderra Labor Club, Weston Creek Labor Club, and 59 Cameron Ave Conference and Events Centre, (collectively the “Club”, “us”, “we”, “our”) is committed to providing you with the highest levels of customer service. This includes protecting your privacy and keeping you informed of our privacy policy.

The Club is required to comply with the provisions of the Privacy Act 1988 (“**Privacy Act**”) which regulates, among other things, the collection, storage, quality, use and disclosure of personal information.

The principal activities of the Club are:

- Providing a venue for members and guests to engage in social activities;
- Supporting the community;
- Providing members and guests access to a range of goods and services; and
- Providing a safe friendly environment for locals to meet.

1 About this Privacy Policy

The purpose of this policy is to explain how the Club complies with the Privacy Act and the Australian Privacy Principles (“**APP**”), which govern the way we must manage personal information (as defined in the Privacy Act), and to protect the personal information of our customers, which we take very seriously.

This policy sets out how we collect, hold, use, disclose and otherwise manage personal information about our members and other customers. We encourage all members and customers to check our website regularly for any updates to this privacy policy. We may update this policy whenever we consider appropriate, for example, to reflect changes to the law or to our business.

In this Privacy Policy, personal information means any information or opinion about an identified individual, or an individual who is reasonably identifiable, whether that information or opinion is true or not and whether it is recorded in a material form or not.

By visiting the Club’s website, interacting with us on social media, attending one of the Club’s premises, using our goods and/or services or by otherwise providing your personal information to us, you confirm your acceptance of the terms of this Privacy Policy and consent to the handling of your personal information as set out in this Privacy Policy. If you do not agree with the terms of this Privacy Policy, please do not use our products, services, website or otherwise provide us with your personal information.

2 Collection

2.1 General

Personal information will generally be collected directly from you using any of our standard forms, membership application forms, competition entry forms, email, comments/contributions to our social media sites, visitor sign-in including sign-in terminals or when you deal with us in writing, by telephone or in person, and other ways of collection as set out above. We will not collect personal information unless the information is reasonably necessary for, or directly related to, one or more of our functions or activities.

We only collect information by lawful, fair and reasonable means.

The types of personal information we collect

- a) names, addresses, e-mail addresses, phone numbers, date of birth, gender, pensioner card numbers, member photographs/photographic identification upon signing-in to one of our venues, occupation;
- b) payment details;
- c) your image through our CCTV / security footage at each of our venues;
- d) information about your past purchases through our venues particularly if you are a member who uses our YouRewards program;
- e) information about any payouts you receive through our gaming machines (including payment information);
- f) information about staff and volunteers, as required in the normal course of human resource management (including but not limited to name, address, date and place of birth, addresses and contact information, tax file number (if provided), emergency contact information, bank account details, right to work information);
- g) mobile location data where a user of the Canberra Labor Club YouRewards App (**the App**) has not disabled location services in their settings to opt out of this feature.

2.2 Premises

The Club premises are subject to screening technologies, personal identification systems and process, membership card systems and video surveillance at all times, and we collect your personal information this way, including by:

- a) Collecting information from your driver's licence or other identification card, or membership card when you enter the premises, when you use the "sign-in terminals";
- b) Collecting information at any of our point-of-sale terminals when we or you swipe your membership card to earn points on food and beverage purchases or benefit from any applicable member discounts;
- c) Collecting Information when you enter, and play with, your membership card in an electronic gaming machine;
- d) Using information from your driver's licence or other identification card or from your car number plate details, to match the personal information we hold about you; and
- e) Monitoring member and guest behaviour in Club venues including with respect to the reasonable consumption of alcohol and to ensure gaming machines are not used by self-excluded individuals.

2.3 Internet

We also collect your personal information:

- a) automatically when you use your computer or mobile device to access the Club website or any Club app including the App or where you have the App installed on your mobile device and location services have not been disabled;
- b) through you utilising the facilities of the Club such as booking a function, or receiving goods or services from the Club, or contacting the Club by telephone;
- c) through bookings and use of payment methods both electronically and otherwise with the Club;
- d) when you visit the Club's website, or use our other online resources, the Club may use cookies, single pixels tags and similar tracking technologies including tools provided by third parties such as Google, to collect or receive personal information;
- e) if you access the Club website or other online platform, or connecting wireless devices to a Club service or network, the information we collect may also include

your IP address, type of operating system, browser type, domain name, date and time of interaction, pages you visit, location when accessing the website and your online behaviour; and

- f) by video surveillance (as described more fully in section 2.2 above).

2.4 Sensitive Information

Sensitive information will be collected from employees. These include health information such as incident and accident reports, medical and doctor's certificates, sick leave and attendance records, workers compensation claims and related information, and medical histories and assessments, including for insurance purposes. The Club may collect biometric information from staff to enable the use of facial recognition to access the Club's systems and facilities.

The Club will not otherwise usually collect information about racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences, criminal records, health information or biometric information. If the Club does so, it will only collect such information where we have obtained your consent, if you apply for a job with the Club; or we are otherwise permitted or required by law to do so.

2.5 Job applicants, staff, contractors, suppliers and volunteers

The Club may also collect personal information about job applicants, Club staff, volunteers who work with us, and details of other people who come into contact with the Club such as contractors and suppliers for the primary purpose of assessing and engaging or employing the person. The Club also holds and uses such personal information for managing the employment or engagement to meet its legal obligations

2.6 Information received from other parties

Sometimes, someone else may provide us with your personal information, with or without your direct involvement. For example, the Club might collect personal information from:

- a) another organisation of which you are a member, such as a local sporting club using our facilities, or community organisation;
- b) a regulatory authority, a local liquor accord or another club industry organisation including without limitation with respect to its statutory obligations;
- c) law enforcement agencies or personnel; or
- d) your representative(s).

If you provide personal information about someone other than yourself, you agree that you have that person's consent to provide the information for the purpose for which you provide it to us. You also agree that you have told the person about this Privacy Policy and where to find it.

2.7 Failure to provide information

If the personal information you provide to us is incomplete or inaccurate, we may be unable to provide you with the products or services you are seeking or admit you as a member or with entry to the Club's premises.

3 Use and Disclosure

3.1 General

Generally, the Club will only use and disclose personal information about you for the purpose for which it was collected, or for a related purpose as permitted by the Privacy Act or for uses for which you have given consent (which may be express or implied) including for the following:

- a) To know who you are, verify your age, identify you and process your membership applications and renewal;
- b) to comply with our requirements under the Liquor Act 2010, Liquor Regulation 2010, Gaming Machine Act 2004, Gaming Machine Regulation 2004, Corporations Act 2001, Anti-Money Laundering and Counter Terrorism laws, Gambling and Racing Control (Code of Practice) Regulation 2002 and other relevant legislation including but not limited to, maintaining and updating exclusion registers;
- c) to comply with obligations relating to the responsible provision of gaming services (if available on site),
- d) to contact members and guests to advertise and market events, activities, opportunities, offers and the goods and services provided by the Club including without limitation with respect to food and beverage, promotions, entertainment, gaming, wagering, gaming machines, sporting events, KENO, TAB, functions and venue hire unless you have opted-out of receiving marketing communications or are listed on an exclusion register in accordance with the Gambling and Racing Control (Code of Practice) Regulation 2002;
- e) to send notices as required by the Club's Constitution, or the Club's obligations under legislation including the Corporations Act 2001, the Gaming Machine Act 2004, Gaming Machine Regulation 2004, the Liquor Act 2010, and the Liquor Regulation 2010;
- f) to analyse usage of food and services offered by the Club and provide you with goods or services you are receiving or utilising as offered by the Club;
- g) to provide any benefits you become entitled to in relation to that product or service you have received or purchased from a Club;
- h) to analyse website and other online resources usage;
- i) to respond to your submissions, questions, comments, requests and complaints;
- j) to conduct our internal business and management processes, for example accounting or auditing purposes;
- k) for any other purposes that would reasonably be expected by you as a result of disclosing your information to the Club or by being a Club Member;
- l) to use the physical location of your mobile device for security purposes and to provide you with alerts, notifications and other information related to our products or services;
- m) for complying with obligations that we may have under laws that apply to our business or to meet requests from regulatory bodies which regulate our business, such as preparing player activity statements and monitoring the responsible provision of gambling services in our Club, including the exclusion of patrons from our Club.;
- n) for Club disciplinary charges and hearings; and to monitor your use of the Club services and facilities;
- o) to provide to relevant authorities when the Club believes that unlawful or undesirable activity is being or has been conducted;
- p) to allow you to use any inhouse wi-fi located in the hotel or the Club; and
- q) to provide to anyone authorised by you to receive your personal information (your consent may be express or implied and can be withdrawn at any time).

When or before the Club collects personal information, the Club will take reasonable steps to inform you directly or indirectly of the purposes for which the information is collected; where applicable, any law that requires the particular information to be collected, and the main consequences for the user if all or part of the information is not provided.

3.2 Disclosure to Law Enforcement Body

If the Club discloses your personal information to a law enforcement body, the Club will make a written note of the use or disclosure.

3.3 Anonymity and Pseudonymity

From time to time, you may be able to visit the Club website or deal with us anonymously or by pseudonym. However, please be aware that, if you do not provide us with certain personal information that we require, under law we may not be able to provide you with the products and/or services that you seek. More specifically, you may be requested to leave a venue if the collection of certain personal information is required for us to comply with certain laws (such as Gaming Machine Act 2004; Gambling and Racing Control (Code of Practice) Regulation 2002 and Liquor Act 2010) and you do not provide this information.

3.4 Marketing and Promotional Materials

We may send you direct marketing communications and information about our services/products, opportunities, member surveys, promotions or events that we consider may be of interest to you if you have requested or consented to receive such communications.

We will not send any marketing communications to those individuals listed on exclusion registers.

These communications may be sent in various forms, including mail, SMS, email and by the App, in accordance with applicable marketing laws, such as the Spam Act 2003 (Cth) which prohibits unrequested commercial messages. You consent to us sending you those direct marketing communications by any of those methods. If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.

You may opt-out of receiving marketing communications from us at any time by contacting us. We will include in each direct marketing communication a prominent statement that you may make such a request. In addition, we may also use your personal information or disclose your personal information to third parties for the purposes of advertising, including online behavioural advertising, website personalisation, and to provide targeted or retargeted advertising content to you (including through third party websites).

3.5 Visitors and Guests

Patrons visiting the Club must produce a recognised form of identification i.e. passport, driver's licence or proof of age card to gain entry to the premises. The Club uses terminals to gather this information to protect the data collected i.e. addresses of patrons. Scanning of licences is optional, and if preferred, use of manual sign-in via the terminals is available for patrons once the form of identification has been sighted by an authorised officer of the Club.

3.6 Surveillance of Venues

The Club is monitored and recorded by Closed Circuit Television ("CCTV"). At all times the Club will advise that your image may be captured before recording with prominent signage.

Details of suspected or actual illegal and/or undesirable activities on our premises may be shared with other clubs, law enforcement and regulatory bodies such as the ACT Gaming & Racing Commission.

3.7 Use of Government Identifiers

The Club will not adopt a government-related identifier of an individual as its own identifier under any circumstances.

4 Disclosure

4.1 Third Party Disclosure

The Club may share your information with other parties who provide services to us, including organisations, agents, partners and contractors that assist us with providing our business processes and products and services. These contracts with third parties will require the third party to keep your personal information confidential and secure. These third parties may include (but are not limited to):

- a) employees, third party service and content providers, dealers, agents, contractors, suppliers, business support services, payment processors, website hosting service providers, rewards and loyalty service providers, cloud storage providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors and professional advisors such as accountants, solicitors, business advisors and consultants;
- b) law enforcement bodies, courts of law or as otherwise required or authorised by law;
- c) regulatory or government bodies;
- d) any organisation for any authorised purpose with your express consent.

4.2 Government Disclosure

The Club will, as required by law or upon reasonable request, disclose personal information to government departments, statutory bodies, authorities and law enforcement. Where authorised by law or by a reasonable request, or for any of the purposes outlined in this Privacy Policy, the Club will disclose personal information to government agencies.

Before personal information about you is disclosed to a contracted third party, the Club will take steps as are reasonably practicable and appropriate in the circumstances to ensure that the third party does not breach the APP in relation to the information.

5 Securing your information

5.1 Security

The Club has security systems in place which are intended to protect your personal information from misuse, interference, loss, unauthorised access, modification, or disclosure by the use of various technical and organisational methods including locked storage of confidential paper records and passworded access to computerised records (depending on the nature of the information that we are holding).

These measures also include:

- a) requiring all Club employees to understand and comply with this policy and their legal obligations in respect to the confidentiality of all information obtained; and

- b) password security for all electronic devices including differing security levels for all Club employees, dependent on their level of responsibility.

5.2 Destruction or De-Identification

We are required by law to keep some types of information for certain periods of time. If we no longer require your personal information or are no longer required to hold it by law, we will generally destroy or de-identify it. We reserve the right to retain information for longer than the minimum period required under any applicable law if we consider that it is appropriate, but we will hold it in accordance with this policy.

If the Club receives personal information about you which it did not request and which it does not reasonably require, we may destroy or de-identify this information where appropriate.

5.3 Cross Border Disclosure

Occasionally, we may disclose personal information to overseas recipients during our business however such disclosure of personal information to overseas recipients is unlikely. At the date of publication of this policy, the Club does not disclose personal information overseas.

The Club is not aware of, and denies liability in respect of, third parties in Australia, to whom the Club has disclosed personal information, transmitting or communicating that information to overseas recipients.

Please be aware that the privacy laws in other countries might not be the same as in Australia. However, where we do disclose your personal information to overseas third parties, we will take such steps as are reasonable to ensure that your personal information is handled in accordance with the APPs.

Important Notice

By providing us with your personal information or otherwise using our products, services or website, you consent to the disclosure of your personal information to these overseas recipients. By consenting to this overseas disclosure, you acknowledge and agree that:

- a) The Club will not be accountable under the Privacy Act for any breach of your privacy by an overseas recipient; and
- b) You will not be able to seek redress from the Club under the Privacy Act for any breach of your privacy by an overseas recipient.

6 Correction

The Club relies on the information provided by members and their guests to be accurate and current. The Club takes reasonable steps in the circumstances to ensure that the personal information it collects, holds, uses or discloses is accurate, complete and up-to-date.

If you believe the personal information we hold about you is incorrect and you seek correction of that information, please advise us in writing by sending a letter or email to the Privacy Officer using the details below and informing us of the correct information.

We will take reasonable steps to correct Club records appropriately and within a reasonable time frame, except where the Privacy Act prohibits it or if there is an exception under law where we may refuse your correction request. We will advise you of the outcome of any request to correct your personal information.

7 Access

The Privacy Act allows individuals to access and alter records containing their personal information. If you wish to access the personal information the Club holds about you, please provide a written request to the Privacy Officer using the details below. The Club will provide you access to your information except where the Privacy Act prohibits it or if there are exceptions under law where we may refuse your request for access.

To change your name on the membership database, supporting documentation from a government source, such as passport or driver's licence is required. Change of addresses can be done by contacting Club reception.

8 Complaints

If you wish to make a complaint about the Club's use of your personal information or you believe there may be a breach of this privacy policy, please put your complaint in writing, providing as much detail as possible, and forward it by letter or email to the Privacy Officer using the details below.

The Privacy Officer, or another representative of the Club, will investigate the complaint and will provide you with a written response within a reasonable time following the completion of the investigation.

If you are not satisfied with the Club's response, you have the right to forward your complaint to the Office of the Australian Privacy Commissioner.

9 Changes to Our Privacy Policy

The Club reserves the right to make changes to this Privacy Policy from time to time. It is your responsibility to review this policy to stay informed about our privacy practices.

By continuing to use our products, services and website or by continuing to provide us with your personal information after these changes have been published, you confirm your acceptance of these changes.

10 Contact Us

Further information on Privacy can be obtained by contacting the Club's Privacy Officer using the contact details below:

Privacy Officer
Canberra Labor Club Group
PO Box 167
Belconnen ACT 2616
Email: admin@laborclub.com.au
Phone: (02) 6251 5522

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