

Ainslie GROUP PRIVACY POLICY

Ainslie Football & Social Club Limited, comprising the Ainslie Football & Social Club and Gungahlin Lakes Golf & Community Club, is committed to complying with the *Privacy Act 1988 (Cth)* (**Act**), and the privacy provisions of all applicable legislation.

We must collect, retain and disclose some private information under Australian law, eg the *GST legislation*, the *Liquor Act 2010*, the *Gaming Machine Act 2004*, the *Gambling and Racing Control (Code of Practice) Regulation 2002*, the *Corporations Act 2001*, and the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006*. This information will generally be retained for a period of seven (7) years.

This privacy policy covers all personal information we hold, that is, information, or an opinion, about an individual, whose identity is apparent, or can be reasonably ascertained, from that information or opinion.

In almost all cases, the Club is either required or authorised to require identification or it will be impracticable to deal with you if you do not identify yourself.

We respect your privacy and the personal information you provide to us and we are committed to protecting it. We collect personal information about you when you:

1. apply to become a member or become a member;
2. are a members' guest, or a visitor at one of our venues;
3. insert your membership card into a gaming machine or loyalty terminal, when participating in promotions, and when providing your membership card for redemption of membership benefits;
4. enter into an ACT Self Exclusion agreement;
5. use a credit card or EFTPOS facilities to make a purchase;
6. use the Club's facilities and services;
7. ask to be included on a mailing list;
8. are an employee of the club or;
9. submit the information to us for any other reason, including the provision of goods and services to the Club.

We collect personal information about you only if it is relevant to providing our services and facilities. This information generally includes:

1. your name, gender, address, age, contact details and image;
2. details in respect of your purchases or our services offered to you, and
3. records of correspondence between us.

We will use your personal information:

1. to help provide the Club's facilities and services to you;
2. to keep you informed of the Club's services or those of our subsidiary, parent or related entities or business partners and third parties or clubs with which we have reciprocal arrangements (direct marketing), to have them send you similar information;

3. to provide to third party service providers or others to help provide a product, facility or service of the Club to you;
4. to provide to our advisers (eg lawyers, accountants and business advisers) if necessary;
5. to be stored or transferred to a subsidiary, parent or related entity (whether in Australia or overseas);
6. to fulfil our contractual duties to you (if any) and enforce your contractual duties (if any) to the Club;
7. for internal purposes such as procedural assessment, risk management, service reviews and improvement, website and advertisement improvement, staff training, accounting and billing; and as otherwise permitted by the National Privacy Principles.

Information That You May Disclose Publicly: When you post information on social media platforms associated with the Club and its venue, it is to be understood that this information is in the public domain and the Club is not in a position to accept any responsibility for whom or why anyone might access the information.

Members are taken to consent to direct marketing. However we give you the opportunity to “opt out” of receiving direct marketing information. Unless you opt out we will assume you have consented to the receipt of that information. You may opt out by contacting us at privacy@ainsliigroup.com.au or by advising our Privacy Officer on 02 6242 6283.

To ensure that data is protected from unauthorised access, modification or disclosure, your personal information is securely stored on our in-house server which is secure within the Club’s computer network. There is limited access to this personal information and our Club’s servers, as well as the database, are each password protected. Our servers are further protected by the use of firewalls and spyware detection software. Membership applications are hard copied and securely archived for a period of 7 years. It is unlikely that we will provide personal information to overseas recipients

If we collect sensitive information (as defined under the Act) we will treat it with the utmost security and confidentiality. We will ensure that it is not collected for any purposes, other than those for which we have obtained the individual’s consent, unless the law requires otherwise, or other exceptional circumstances prevail as described under the Act.

We destroy or permanently delete your personal information once it is no longer needed or required to be kept by law. However, some personal information is required by law to be retained for a period of seven (7) years.

All persons who enter the Club premises are taken to consent to: (a) scanning of personal information via our terminals, (b) having their image taken, (c) being recorded on CCTV security cameras; and (d) the Club using this personal information to manage or protect its interests, or prevent or lessen a serious or imminent threat to somebody’s life or health.

Scanning of recognised identification forms is optional, and if preferred, use of manual sign-in via the terminals, and having your image taken, is available once a recognised identification form has been sighted by an authorised officer of the Club.

Your information may be used for demographic data for aggregate use by us, our business partners, or our advertisers. This information is not linked to any personal information that can identify you.



Where lawful and practicable, individuals may transact with the Club without providing personal information. However, as a Licensed Club, we are required to collect basic personal information that covers data such as name, date of birth, address and contact details.

When you visit the Club website our internet service provider makes a record of the visits and logs the following information for statistical purposes - the user's server address, the user's top-level domain name (eg: .com, .gov, .au, etc), the date and time of visit to the site, the pages accessed and documents downloaded, the previous site visited and the type of browser used. No attempt will be made by the Club to identify users or their browsing activities.

We may use 'cookies' to enhance the functionality of the website; however, cookies are not used to record any personal information (eg: name, address, e-mail address).

We may collect personal information if you send us a message or submit a request for further information regarding one of our products or services.

If you do not provide the personal information we require it may not be possible to provide you with facilities or services, nor do business with you.

The Ainslie Group supports the responsible provision of gaming facilities. As such the Club has developed a Self-Exclusion Program excluding members with gambling problems from the gaming area. To assist in the execution of this program it is necessary to provide the details including a current photo of the excluded member. This information must be made available to gaming staff to identify excluded members who may be in the gaming area. This information is stored in a secure area, only accessible by staff and only after approval by the excluded member. All gaming staff have been trained in responsible gaming practices and are aware of the confidentiality and privacy rights of self-excluded members.

If you believe any personal information collected from you is inaccurate, please inform our receptionist so the details can be corrected.

As the Club is committed to protecting the privacy of individuals, we will view unauthorised disclosure of, or access to, personal information by our employees, contractors or agents, as a serious breach of this policy. Appropriate action (which may include disciplinary or legal action) will be enforced. If you think we have committed a breach of the Australian Privacy Principles, or a registered APP code, you may make a complaint in writing to our Privacy Officer either by post:

Privacy Officer
The Ainslie Group
P.O Box 636
Mitchell ACT 2911

Or by email:

privacy@ainsliegroup.com.au



You may acquire more information about the way we manage your personal information or about obtaining access to your personal information by contacting our Privacy Officer on 02 6242 6283 or by e-mail on privacy@ainsliigroup.com.au. However, the Club may occasionally need to deny access to information in accordance with the exemptions contained in the Act.

We may modify this Privacy Policy from time to time. Therefore, you should periodically review this document to ensure that you have read and agree with our most current Privacy Policy.