

# PRIVACY POLICY

Wests Entertainment Group is committed to protecting our patrons' privacy through compliance with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles.

Wests Entertainment Group covers the whole group and includes West Tamworth League Club, Wests' Diggers and The Courts @ East.

The *Privacy Act 1988* (Cth) regulates how organisations such as Wests Entertainment Group manages patrons' personal information. The Act also includes the Australian Privacy Principles which direct how information should be collected, used, managed and secured. The 2017 Amendment to the Privacy Act has also introduced the Notifiable Data Breach Scheme, which outlines responsibilities such as monitoring, responding, assessing, and reporting relevant information breaches. We will also undertake reasonable steps to ensure compliance with the General Data Protection Regulation (GDPR) where applicable.

## PURPOSE

Wests Entertainment Group Privacy Policy provides an overview of what and why we collect, store and use the personal information that we receive or create about our patrons.

## SECURITY OF PERSONAL INFORMATION

At Wests Entertainment Group we regard privacy of information seriously and will take reasonable precautions to ensure the security of our patrons' personal information from misuse, interference, loss and unauthorised access, modification or disclosure; and how it is collected, kept secure, used and disclosed. This will include:

- Maintaining governance standards and security measures that prevent data breaches
- Ongoing monitoring of any potential breaches
- Containing any data breaches that may occur
- Assessing any potential serious harm that any breach may have on our patrons
- Taking remedial action to minimise any harm
- Notifying patrons of the data breach in the event that there is the likelihood for serious harm
- Reviewing the data breach incident including investigating the cause of the breach, developing prevention plans and adapting any finding to improve Wests Entertainment Group processes and procedures



## WHY WE COLLECT AND HOLD PERSONAL INFORMATION

We may collect and hold your personal information to:

- Identify you and verify your identity
- Manage and control the quality of our services to you
- Market our services to you
- Undertake research and analysis related to our services in order to improve them
- Maintain security at our venues by collecting information from your driver's licence when you enter our venues
- Assist you with enquiries or complaints
- Forward information relating to activities of Wests Entertainment Group including regulatory reports and notices to members
- Record, keep and update our members' loyalty bonus points
- Record, keep and update our player accounts
- Comply with our legal and regulatory obligations, for example, we may be legally required to collect personal information under the *Registered Clubs Act 1976*, *Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) Act 2006* (Cth), *the Corporations Act 2001* (Cth) and other legislation

Wests Entertainment Group may collect personal information from minors and will respectfully limit the collection of such personal information to what is reasonably necessary to participate in a club event. Reasonable additional steps will be taken with regard to collecting personal information from minors. These include:

- Types of personal information collected from minors
- Limiting our collection of personal information from minors to no more than is reasonably necessary
- Restricted uses of the personal information
- Access to parents to correct or remove personal information relating to the minor



## PERSONAL INFORMATION WE MAY COLLECT AND HOLD

The kinds of personal information that Wests Entertainment Group may collect and hold about you depends on the nature of your dealings with us and requirements of applicable laws, regulations, licence conditions and betting rules:

- Name
- Gender
- Date of birth
- Contact number
- Residential address
- Email address
- Postal address
- Signature
- Identification documentation including driver's licence, passport, NSW photo card
- Information for security purposes such as footage from CCTV surveillance
- Members activity information including gaming data and purchase history
- Information required for employment purposes
- Information required for functions or activities including credit card or bank account details. For example, function bookings, ticket sales.
- Information required for marketing purposes

Wests Entertainment Group does not capture or store patrons' card number, licence number or passport number from driver's licences, passports or NSW photo cards.

## HOW WE COLLECT AND HOLD PERSONAL INFORMATION

Wests Entertainment Group will collect personal information through membership registration and as patrons access our facilities and services. This personal information is held on our software systems which are secure.

## HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION

Personal information collected and held by Wests Entertainment Group will be destroyed or de-identified when the personal information is no longer in use and there is no legal requirement to store the personal information.



## USE OR DISCLOSURE OF PERSONAL INFORMATION

Personal information will not be used or disclosed for any purpose other than our primary purpose unless:

- The individual has consented to the use or disclosure
- The information is not sensitive and is for the secondary purpose of direct marketing
- The use is required or authorised by or under the law

## HOW CAN YOU ACCESS AND SEEK TO CORRECT PERSONAL INFORMATION

If you wish to contact us regarding your personal information or make corrections, please email our team at: [privacy@tamworthwests.com.au](mailto:privacy@tamworthwests.com.au)

## HOW CAN YOU SUBMIT A PRIVACY COMPLAINT

If you wish to submit a privacy complaint, please email our deputy CEO at : [jamesc@tamworthwests.com.au](mailto:jamesc@tamworthwests.com.au)

## DISCLOSURE OF PERSONAL INFORMATION TO OVERSEAS RECIPIENTS

Where necessary, Wests Entertainment Group may disclose personal information to overseas recipients such as service providers located outside Australia that provide, among other things, customer relationship management, identification and fraud detection, cloud and data storage, IT support and/or other third-party services to us.

If personal information is disclosed overseas, we will take reasonable steps to ensure appropriate compliance with privacy requirements.

