

1. Overview

Casino RSM Club's Privacy Policy aims to promote responsible and transparent handling of personal information and assist in meeting the obligations of the *Privacy Act 1988 (Commonwealth) and Australian Privacy Principles (APPs)*. Casino RSM Club is committed to safeguarding the personal information it collects. This policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.

2. Commencement date

This policy will commence from 1 September 2021. It replaces all other policies in relation to Privacy (whether written or not).

3. Scope

This document is a company policy of Casino RSM Club. It applies to all employees of Casino RSM Club but does not form part of any employee's contract of employment.

If clarification of the application of this policy is required, please contact the Secretary Manager.

4. Policy

Companies with an annual turnover of \$3 million or more, or with obligations under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006*, have obligations under the *Privacy Act 1988* to uphold the *Australian Privacy Principles (APPs)*.

To ensure Casino RSM Club meets its compliance responsibilities this policy aims to ensure we abide by our privacy obligations in a consistent manner.

The policy contains the following information:

- The kinds of personal information Casino RSM Club collects and holds;
- How Casino RSM Club collects and holds personal information;
- The purposes for which Casino RSM Club collects, holds, uses and discloses personal information;
- How a person may access personal information held about them and ask for correction of their personal information;
- How a person may complain about a breach of the APPs and how Casino RSM Club will deal with such complaints.

4.1. Rationale

Personal information is information or an opinion that identifies an individual. Examples of personal information we collect include: names, addresses, email addresses, phone and facsimile numbers and gaming and sales information.

Personal Information is obtained in many ways including; correspondence, by telephone and facsimile, by email, via our website www.casinorsm.com.au from media and publications, from other publicly available sources, from cookies, when you complete a membership application form. and from third parties. We don't guarantee website links or policy of authorised third parties.

In general, we attempt to limit the collection of sensitive information we collect from you; however, we may be required to collect sensitive information from you in order to carry out the services provided to you. We will not collect sensitive information from you without your knowledge or consent.

Casino RSM Club recognises that the personal information of members should only be used for the purpose for which it was collected. Although the APPs provide for the ability of people to act anonymously or use pseudonyms, there will be times when we are legally required to collect personal information directly from you. Where we are required by law to collect information from you we will notify you at the time, or as soon as practicable, to ensure that you are aware of such collection and its purpose. Where unsolicited personal information is received by Casino RSM Club it will be afforded the same privacy protection as solicited personal information. Casino RSM Club will apply procedures to determine whether it could have collected the information under the provisions of the APP's and take reasonable steps to notify individuals that it has collected personal information from someone other than the individual.

4.2. Privacy

Casino RSM Club 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.

Casino RSM Club is a registered Club under the *Registered Clubs Act 1976 (NSW)*. Casino RSM Club is required to comply with the provisions of the *Privacy Act 1998* which regulates, among other things, the collection, storage, quality, use and disclosure of personal information.

The principal activities of Casino RSM Club are:

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

4.3. Collection - The kinds of personal information Casino RSM Club collects and holds

Casino RSM Club will only collect and hold personal information that is necessary for one or more of its functions or activities and will collect personal information only by lawful or fair means and not in an unreasonably intrusive way.

Casino RSM Club collects your personal Information for the primary purpose of providing our services to you and marketing. The type of information Casino RSM Club collects includes personal information from members such as name, address, occupation, date of birth, proof of identity, contact details, transaction history and, in some cases, credit card and bank account details and the extent of your use of, and purchase of goods and services offered by, or available at or from Casino RSM Club. We collect your details as required as part of your Casino RSM Club membership or visitation, including but not limited to the information required under the members' and visitors' registers, photographs or video footage taken at our premises. Also, if you access Casino RSM Club website, the information we collect includes your IP address, type of operating system, type of browser you operate and the area generally where you are located when accessing the website.

4.4. How Casino RSM Club collects and holds personal information

Casino RSM Club collects this information from you by various means including, without limitation, by you completing your membership application or renewal form, by you entering Casino RSM Club as a temporary member or guest of a member via our electronic sign-in system, by you completing entries into competitions and promotions and automatically when you access Casino RSM Club website. If you do not provide the required mandatory information, we may be unable to provide our services to you.

We are required to take steps to help keep your personal information safe. We aim to take reasonable steps to:

- Make sure the personal information we collect, use or disclose is accurate, complete and up to date;
- Keep your personal information secure within our computer system and where your personal information has been provided in hard copy format, this information is either destroyed when no longer required, held securely on a/an Casino RSM Club site, held securely within the control of our Sub-Club representatives or held securely in off-site storage;
- Protect your personal information from misuse, loss, unauthorised access, modification or disclosure both physically and through computer security methods.

4.5. Storage

Personal information is stored and archived for a period of seven (7) years. This includes information about non-members and Internet site transmission logs.

4.6. The purposes for which Casino RSM Club collects, hold, uses or discloses personal information

Casino RSM Club collects this information in order to:

- Identify you and process your membership application;
- Meeting statutory requirements under the *Registered Clubs Act (NSW)*, *Anti-Money Laundering and Counter-Terrorism Financing* laws and other relevant legislation;
- Contact members to advertise and market events, activities, opportunities, offers and the goods and services provided by Casino RSM Club or companies in which Casino RSM Club has an ownership interest (including by direct mail, telephone, SMS and MMS) including without limitation, with respect to food and beverage, promotions, entertainment, wagering, gaming machines, sporting events and venue hire;
- Analyse usage of services offered by Casino RSM Club;
- Provide you with goods or services you are receiving or utilising as offered by Casino RSM Club and to offer and administer any benefits you subsequently become entitled to in relation to that product or service;
- Share your information with companies in which Casino RSM Club has ownership or interest for the purpose of them marketing their products to you;
- Analyse web usage.

Casino RSM Club will only use your personal information for the purpose for which you have provided it, e.g. for the application of Casino RSM Club membership or to gain entry to Casino RSM Club premises as a visitor or guest or for other uses as permitted by the *Privacy Act* or uses for which you have consented to having your personal information used for.

When or before Casino RSM Club collects personal information, Casino RSM Club will take responsible steps to inform the individual providing the information of:

1. the purposes for the information is collected,
2. where applicable, any law that requires the particular information to be collected, and
3. the main consequences for the user if all or part of the information is not provided.

Casino RSM Club will be unable to allow you to join Casino RSM Club or to be a temporary member unless you have provided us with the required personal information. Casino RSM Club will also be unable to provide you with certain goods and services or to join a Sub-Club, unless you have first provided Casino RSM Club with required personal information.

Casino RSM Club may disclose your information to third parties that provide services under contract to Casino RSM Club. These contracts require the third party to keep your personal information confidential and secure.

From time to time, Casino RSM Club may wish to carry out a voluntary survey for feedback. Before collecting survey results, Casino RSM Club will advise you of the purpose of the survey e.g to gain information for Casino RSM Club to improve services etc.

4.7. Visitors and guests

Under the *Registered Clubs Act*, patrons visiting Casino RSM Club must produce a recognised form of identification i.e. passport, driver's licence or proof-of-age card to gain entry into the premises. Casino RSM Club uses terminals to gather this information and to protect the data collected i.e. addresses of patrons. Scanning of licences is optional and, if preferred, the 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 Casino RSM Club.

4.8. Surveillance of venue

Casino RSM Club is subject to video and audio surveillance for security reasons. 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 Liquor & Gaming NSW and the Independent Liquor and Gaming Authority.

4.9. Cross-border disclosure

Casino RSM Club does not transmit personal information across border. As far as Casino RSM Club is aware, none of its contractors transmit or store data across border.

Casino RSM Club is not likely to disclose information to overseas recipients; however, understands that the APP's place an obligation on us to ensure that the overseas recipient does not breach the APP's.

4.10. Access and correction

Casino RSM Club relies on the information provided by members to be accurate and current. Casino RSM Club will take reasonable steps to ensure that the personal information it collects, uses or discloses is accurate, complete and up-to-date. If you believe that the personal information we hold on you is incorrect, please advise us in writing, sending your letter or email to the Privacy Officer using the details at clause 4.2.7 of this policy. We will take reasonable steps to correct Casino RSM Club records appropriately and within a reasonable time frame except where the *Privacy Act* prohibits it or does not require it.

The *Privacy Act* allows individuals to access and alter records containing their personal information, subject to certain exceptions. If you wish to access the personal information Casino RSM Club holds about you, please provide a written request to the Privacy Officer using the details at clause 4.2.7 of this policy. Casino RSM Club will provide you access to your information except where the *Privacy Act* prohibits it or does not require it.

To change your name on the membership database supporting documentation from a Government source is required. Change of addresses can be done by completing an 'Update Your Details 'form, by letter or by use over the internet. Casino RSM Club does not use government related identifiers.

It is important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up to date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

Casino RSM Club will not charge any fee for your access request, but may charge an administrative fee for providing a copy of your Personal Information. In order to protect your Personal Information we may require identification from you before releasing the requested information.

4.11. **Complaints**

Casino RSM Club will take complaints about a breach of privacy seriously. If you believe that we have breached your privacy or if you wish to make a complaint about Casino RSM Club's use of your personal information please:

- Put your complaint in writing;
- Provide as much detail as possible; and
- Forward the complaint by mail or email to the Privacy Officer (details below).

The Privacy Officer will investigate the complaint and provide you with a written response following the completion of the investigation.

4.12. **Privacy officer**

Further information on Privacy can be obtained by using the contact details below:

Assistant Secretary Manager

Simone Skennar

Casino RSM Club

162 Canterbury Casino NSW 2470

p: 02 662 1666

e: admin@casinorsm.com.au

5. **Policy compliance**

Policy compliance will be facilitated through education, publicity, widespread promotion and reiteration of the policy.

For staff members, non-compliance may lead to disciplinary action in accordance with Casino RSM Club's disciplinary procedures. All staff members operating in management and supervisory positions are accountable for enforcing the policy amongst staff members.

6. **Availability**

This policy or an approved form thereof will be displayed and maintained on Casino RSM Club's website and made available free of charge upon request.

7. Variations

Casino RSM Club reserves the right to vary, replace or terminate this policy as required

Policy version and revision information

Policy authorised by: Neale Genge

Title: Secretary Manager

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