

# PRIVACY POLICY

Wantirna Club respects your personal information and this Privacy Policy sets out the principles that we will follow in the management of your personal information collected. Personal information is generally defined as information or an opinion that can identify you personally. We have policies and procedures to ensure that all personal information, no matter how or where it is obtained, is handled sensitively, securely and in accordance with the Australian Privacy Principles.

This Privacy Policy explains

- why we require and how we aim to use personal information;
- what types of personal information we might collect;
- when we will disclose personal information to others;
- how we hold and secure personal information;
- how you can access and seek correction of personal information we hold about you; and
- how you may make a complaint if you think we have breached our obligations.

Please note the Australian Privacy Principles do not apply to employee records. As a result, this statement does not apply to Wantirna Club's treatment of employee records where the treatment is directly related to a current or former employment relationship between Wantirna Club and an employee.

## 1. COMPLIANCE WITH THE PRIVACY LEGISLATION

Wantirna Club is committed to protecting the privacy of individuals' personal information and is bound by the Australian Privacy Principles set out in the *Privacy Act 1988* (Commonwealth) ("*the Act*"). We will only collect, use or disclose personal information in accordance with the Act and our Privacy Policy.

## 2. COLLECTION AND USE OF PERSONAL INFORMATION

We will collect personal information from you directly and from your use of our products and services (including attendance at venues). We may collect information about you from others, such as our related bodies corporate or third party service providers or contractors. We may also collect information about you that is publically available, for example from media publications, social media, and the internet or made available by third parties.

Wantirna Club only collects and uses personal information that we consider necessary or desirable for us to carry out our many business functions or activities, including, without limitation, so we can:

- establish your identity to assess applications for certain products, services, programs or special offers and to prevent and address fraud;
- administer our products and services (including any related charging and billing);
- maintain and update our records;
- manage our relationship with you;
- responding to feedback, queries or complaints
- develop and improve our existing products, services, programs and special offers;
- develop and create new products, services, programs and special offers;
- improve customer service;
- contact you if we need to communicate something important to you (this may occur on a variety of mediums such as email, SMS, social media and web pages you may visit);
- identify and let you know about our products, services, programs or special offers we think might interest you (for example, we may use location and other available profiling data collected through our websites and mobile applications to identify specific products or offers we think you may be interested in);
- market the products, services, programs or special offers of any of our related bodies corporate or program partners we think may interest you and enable those companies to market directly to you; and
- comply with legal and administrative requirements or requests from any government, regulatory or judicial agency or stock exchange.

If you are applying for employment or to become a contractor of Wantirna Club, Wantirna Club may collect personal information to assist in any assessment of your application and (if successful) engage you.

Identifying details such as your name and address will only be collected and used where we consider we have a business reason to do so, such as providing products and services to you or a legal requirement.

We may also collect information about you because we are required to do so by law. There are laws that affect the gaming and liquor industry, such as Commonwealth Anti-Money Laundering and Counter Terrorism Financing legislation, which require certain personal information to be collected and used primarily to verify your identity.

You are not required to provide us with your personal information. However, in certain circumstances, if you do not provide us with your personal information, we may not be able to provide you with the products or services you want or let you know about other products or services from us, our related bodies corporate or program partners that you may be interested in.

### **3. TYPES OF PERSONAL INFORMATION COLLECTED**

Wantirna Club offers a diverse array of hospitality experiences including bistros, electronic gaming, bars and functions, therefore the purpose and type of personal information which we may collect from you will vary depending upon the relationship you may have with us. For example, we may require certain information about you should you apply for employment, which is different from the information you supply if you are entering a competition or joining a loyalty program.

The most common situations where we may collect personal information from you include entry conditions, gaming procedures and regulations, loyalty programs, marketing and promotions, accommodation bookings, employment applications, social media and situations where the law requires.

The most common types of personal information we may collect include:

- identification information such as your name, address and date of birth;
- contact details such as email address and phone numbers; and
- financial details such as tax file number, credit card and bank details.

We may also collect and use copies of documents to confirm your personal information. Typically this will relate to your identity as verified by a drivers licence or passport.

### **4. DISCLOSURE**

Wantirna Club will only use or disclose personal information for the primary purpose of collection, for other related purposes for which you would reasonably expect it to be used, with your consent or otherwise as permitted by law.

Wantirna Club does not generally disclose personal information to third parties except:

- where third party contractors appointed by Wantirna Club require access to personal information held by us to perform services or provide products for us or on our behalf;
- to related bodies corporate;
- to agents of Wantirna Club;
- where Wantirna Club is required or authorised by law; or
- with your consent.

Should third parties be given access to personal information, Wantirna Club requires that our contractors and agents are obliged to manage that information in accordance with applicable laws.

Generally, Wantirna Club uses systems located within Australia. However, from time to time we may send your information overseas to service or product providers or other third

parties who operate or hold data outside Australia or its external territories. Where we do this, the overseas recipients are likely to be located in India or USA and we take reasonable steps to ensure that appropriate data handling and security arrangements are in place.

## **5. MARKETING**

Given Wantirna Club offers an array of hospitality experiences, we would like to inform you of our products and services or the products and services of our related bodies corporate or program partners from time to time. Wantirna Club may use your personal information that we collected from you to send marketing or promotional material about our food and beverage offers, entertainment and events, competitions and promotions or membership and loyalty programs or to enable our related bodies corporate or program partners to directly market their products and services to you.

We or our related bodies corporate and program partners may conduct these marketing activities via email, telephone, SMS, social media or other means.

If you no longer wish to receive the material, each time you are sent a marketing communication we will provide an easy opportunity for you to 'opt-out' or you may contact us and we will process your request as soon as practicable.

## **6. HOW WE USE COOKIES AND WEB-TRACKING TOOLS**

Wantirna Club may collect "clickstream" information (this may include which areas of our websites you have accessed, the time and date of access, the type of browser software used) from your use of our websites and mobile applications. We may also store "cookie" information (such as user preferences relating to your use of our websites) on your computer. That information is used to customise and improve our websites, mobile applications, products, services, programs and special offers.

Wantirna Club does not use "cookies" to retrieve information from your computer that was not originally sent by us. We do not allow or share third party access to "cookies" placed by our websites. If you do not want us to store "cookie" information on your computer, you can adjust the settings on your Internet browser to disable this feature. However, parts of our websites will not function if "cookies" have been disabled.

## **7. HOW WE HOLD AND SECURE PERSONAL INFORMATION**

Wantirna Club will take reasonable steps to protect the personal information it collects from misuse, interference and loss and unauthorised access, modification or disclosure.

There are a number of different ways we take care of your personal information. Electronic records of personal information are held on secure servers that are password encrypted or within controlled environments such as the back office of

venues which are not accessible to the general public. Physical records of personal information are stored within a controlled environment such as the back office of venues which are not accessible to the general public. Our employees are required to maintain the confidentiality of any personal information held by Wantirna Club. All information that is stored by third parties on our behalf is covered by contractual arrangements designed to ensure information is held in substantially the same manner as detailed above.

Once your personal information is no longer needed by Wantirna Club is not legally bound to retain such information, we will ensure measures are taken to destroy or de-identify your personal information.

## **8. SEEKING ACCESS**

You have the right to access personal information that Wantirna Club holds about you (except in the limited circumstances contained in the Act). We will provide access to your personal information within a reasonable period of time upon written request. For most requests, your information will be provided free of charge, however we may charge a reasonable fee if your request requires substantial effort on our part.

Requests for access should be made in writing to the relevant Wantirna Club, 350 Stud Road Wantirna VIC 3152.

## **9. CHANGING INFORMATION**

It is your responsibility to ensure all personal information collected from you is accurate, up to date and complete. If you wish to change personal information that is inaccurate or out-of-date, you may write to Wantirna Club, at the address specified in paragraph 8 above and the record will be changed as soon as practicable.

## **10. COMPLAINTS**

If you wish to make a complaint about a breach of the Australian Privacy Principles or Act, please contact The Privacy Officer at the address specified in paragraph 8 above. If your complaint is not resolved by the Privacy Officer, or you do not wish to contact the Privacy Officer, you can make an application to the Office of the Australian Information Commissioner at GPO Box 5218, Sydney, NSW 2001.

## **11. AMENDMENTS TO THIS POLICY**

Wantirna Club may amend this Privacy Policy from time to time at its discretion. For a copy of the most recent version of this policy, please refer to our website [www.wantirnaclub.com.au](http://www.wantirnaclub.com.au)

## **12. QUESTIONS ABOUT PRIVACY**

If you have any questions or concerns about Wantirna Club's collection, use or disclosure of your personal information, please contact Wantirna Club at the address specified in paragraph 8 above.

For further information about privacy issues, please refer to the Office of the Australian Information Commissioner's website at [www.privacy.gov.au](http://www.privacy.gov.au)