

# REDCLIFFE RSL PRIVACY POLICY – Members and Guests

Version: 22nd March 2024

Redcliffe RSL Club is committed to respecting and protecting the privacy of all our patrons, while at the same time providing the highest quality of service to our members and guests.

This privacy policy tells you how we collect and manage your personal information, including when you:

- visit our club;
- become a member;
- use any of our leisure, gaming or entertainment services;
- use any of our other services, including purchasing food and beverages;
- visit our website.

If you have any questions or concerns about how we handle your personal information, please email us at [enquiries@redcliffersl.com.au](mailto:enquiries@redcliffersl.com.au).

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## 1. What personal information we collect and hold about you

The personal information we collect about you depends on how you deal with us or what you choose to share with us.

When you **join our Club as a member**, the personal information we collect about you includes your full name, date of birth, gender, address details, phone number and email address.

When you **visit our Club as a guest**, the personal information we collect about you includes your full name, date of birth, address, contact details, copy of an identity document such as your driver's licence.

When you **use any of our products or services as a guest or member** of the Club, the personal information we collect about you includes:

- details required as part of your club membership or visitation, including the information required under the member and visitor's registers;
- when you use your membership card, details of the products and services you have purchased from us through our POS (point of sale) terminals;
- photographs or CCTV video footage taken at our premises, which may include you;
- details of any enquiries or complaints made by you;
- your opinions, statements and endorsements collected personally or via surveys and questionnaires, including but not limited to your views on the products and services offered by the Club;
- any additional information necessary to deliver our products and services and to respond to your enquiries.

When you use your membership card with **any of our gaming services**, the personal information we collect about you includes information about how you use and interact with our gaming services. For example, stroke and movement data, spend data, rating grade, rewards point balance, points transaction history and machine usage information.

If you are a **veteran or returned service person** and sign-up to a 'Service Membership', your status will be included in your membership details and recorded when you use our Club's amenities. For more information about the processing of personal information as part of a 'Service Membership', please refer to the [<RSL Queensland Privacy Policy>](#).

If you **visit our website**, we collect any information relating to you that you provide to us directly or indirectly through the use of our website. For example, your IP address, type of operating system, type of browser you operate and the area generally where you are located when accessing our website.

Under some circumstances, we may need to collect sensitive information about you to ensure personal safety. At all times, we will limit the collection of sensitive information to the minimum amount required in the circumstances. If we collect your sensitive information, we will do so only with your consent, if it is necessary to prevent a serious and imminent threat to life or health, or as otherwise required or authorised by law, and we take appropriate measures to protect the security of this information.

## 2. How we collect your personal information

We collect personal information from you when you interact or transact with us. This includes when you:

- complete a membership application or renewal form;
- enter our venue as a member or guest;
- have conversations with us;
- participate in surveys, questionnaires, entries into competitions or promotions;
- use your membership card at our venue;
- post a review or comment on one of our social media pages;
- attend our events;
- use our website;
- apply for a position with us.

If we collect details about you from someone else, we will only ask for or collect personal information that is reasonably necessary for one or more of our functions or activities.

If you use our website, we may utilise cookies which enable us to monitor traffic patterns and to serve you more efficiently if you revisit our website. A cookie does not identify you personally but may identify your internet service provider or computer. You can set your browser to notify you when you receive a cookie and this will provide you with an opportunity to either accept or reject it in each instance.

You do not have to provide us with your personal information. Where possible, we will give you the option to interact with us anonymously or by using a pseudonym. However, if you choose to deal with us in this way or choose not to provide us with your personal information, we may not be able to provide you with our services or otherwise interact with you.

### **3. How we use your personal information**

We use or disclose your personal information for the purpose for which you have provided it, or for purposes permitted under the Privacy Act 1988 (Cth), or for the purposes that are set out in this Privacy Policy.

The Club collects personal information from you in order to:

- identify and verify you as part of your membership application process or as part of entry to our venue;
- provide our products and services to you, which include but is not limited to the administration and management of our products and services;
- offer you updates, or other content or products and services that may be of interest to you;
- facilitate the administration, management and improvement of our Club;
- as required by law, maintain various registers, including but not limited to, the register of excluded persons;
- facilitate medical assistance in the event of a medical emergency;
- co-ordinate, manage and maintain good order and security of the Club and our premises;
- investigate and report information to third parties regarding any accidents or incidents that may have occurred at our premises;
- facilitate marketing and promotional activities, encompassing the advertisement of events, opportunities, offers, and the goods and services provided by the Club including without limitation with respect to food and beverage, our customer loyalty program, entertainment, gaming, wagering, gaming machines, sporting events and event hire by us;
- provide customer service functions, including handling customer enquiries and complaints;
- conduct analyses, surveys and research (including market research) to enhance existing, and develop new services, including food and services offered by us, website usage and improvements to our website;
- conduct our internal business and management processes, for example accounting or auditing purposes;
- fulfil our legal, regulatory and risk management obligations, including establishing, exercising or defending claims;
- comply with obligations that we may have under laws that apply to our Club or to meet reasonable requests from law enforcement and regulatory bodies such as the Office of Liquor and Gaming Regulation, such as to monitor the responsible provision of gambling services in our Club, including the exclusion of patrons from our Club; and
- monitor your use of our Club, its services and facilities.

#### **4. Who we disclose your personal information to**

We disclose your personal information for the purpose for which it was collected, or for any related purposes as permitted by the Privacy Act 1988 (Cth) or for uses which you have given consent (which may be express or implied).

We disclose your personal information to:

- RSL State Office;
- Maxgaming and like companies who operate monitoring and gaming services on our behalf, to help the Club identify, retain and reward its members and optimise your use and enjoyment of Club amenities;
- other third-party service providers or contractors for the purposes of operation of our website or our services, fulfilling requests by you, and to otherwise provide products and services (for example, our IT providers, trade suppliers, ticketing agents, and payment service providers);
- our marketing and advertising providers to, on our behalf, market events, activities, opportunities, offers and the goods and services provided by us;
- our professional service advisors.

Your personal information is disclosed to these third parties only in relation to the goods or services we provide to you or for a purpose permitted by this Privacy Policy. We take reasonable steps to ensure these third parties agree to safeguard and keep your information confidential (except where we are authorised or required by law to disclose the information).

#### **5. Disclosure overseas**

From time to time, we may utilise third-party service providers who have servers located outside of Australia but otherwise, personal information is generally stored within Australia.

Where we disclose your personal information to third parties overseas, we will take reasonable steps to ensure that data security and appropriate privacy practices are maintained. We will only disclose to overseas third parties if:

- you have given us your consent to disclose personal information to that third party; or
- we reasonably believe that:
  - the overseas recipient is subject to a law or binding scheme that is, overall, substantially similar to the APPs; and
  - the law or binding scheme can be enforced; or
- the disclosure is required or authorised by an Australian law or court / tribunal order.

#### **6. How we hold and protect your personal information**

The Club holds physical documents and files which contain personal information in restricted access areas. All files are only accessible by approved personnel. Electronic personal information is stored on servers that are controlled by the Club. We also store personal information in web-based applications on data servers which are owned or operated by third parties (e.g., cloud sharing services, Maxgaming). The Club will take reasonable steps to ensure that any third-party providers comply with applicable data protection laws.

We will take reasonable steps to protect personal information that we hold about you from misuse, interference, and loss and from unauthorised access, modification or disclosure. We use a combination of technical solutions, security controls and internal processes to help us protect your information and our network from unauthorised access and disclosure. You will appreciate however, that we cannot guarantee the security of all transmissions or personal information, especially where the Internet is involved.

We take reasonable steps to not keep your personal information for longer than we need to. In most cases, this means that we will only retain your personal information for the duration of your relationship with us unless we are required to retain your personal information for longer to comply with applicable legal and regulatory obligations, for example record-keeping obligations.

## **7. How you can access and correct your personal information**

We will endeavour to keep your personal information accurate, complete and up to date. If you wish to make a request to access and/or correct the personal information we hold about you, you should make a request by contacting us (refer to section 12 below for details).

## **8. Complaints**

For complaints about how we handle or manage your personal information, please contact us using the details in section 12 below. Note, we may require proof of your identity and full details of your request before we can process your complaint.

It will not always be possible to resolve a complaint to everyone's satisfaction. If you are not satisfied with our response to a complaint, you have the right to contact the Office of Australian Information Commissioner (at [www.oaic.gov.au/](http://www.oaic.gov.au/)) to lodge a complaint.

## **9. Marketing**

We may send you direct marketing communications and information about our products and services that we consider may be of interest to you. We will send these communications in various forms, including: mail, SMS, and email, following applicable marketing laws such as the *Spam Act 2003* (Cth).

If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. In addition, at any time, you may opt-out of receiving marketing communications from us by contacting us (see details below in section 12) or by using opt-out facilities provided in the marketing communications. We will then ensure that we remove your name from our mailing list.

## **10. Changes to this Policy**

If we decide to change our Privacy Policy, we will post those changes on our website so you are always aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If you have questions or concerns regarding this policy, please contact us using the contact details in section 12 below.

## **11. Definitions**

For the purposes of this Policy “personal information” has the meaning given to it in the Privacy Act 1988 (Cth). In general terms it is any information that can be used to identify you personally. This may include information or an opinion that personally identifies you either directly (e.g., your name) or indirectly.

Redcliffe RSL Club is the Returned & Services League of Australia (Queensland Branch) Redcliffe Sub Branch Inc t/a Redcliffe RSL

## **12. How to contact us**

If you have a question or concern in relation to our handling of your personal information or this Privacy Policy, you can contact us for assistance as follows:

Email: [enquiries@redcliffersl.com.au](mailto:enquiries@redcliffersl.com.au)

Post: PO Box 34, Redcliffe QLD 4020

Telephone: 07 3897 6000

## REDCLIFFE RSL PRIVACY COLLECTION NOTICE – Members and Guests

Redcliffe RSL is committed to respecting and protecting the privacy of all our patrons. This notice tells you what personal information we collect about you and what we do with that information. More detailed information is included in our Privacy Policy. A staff member can provide you with a copy of that Policy and it is also on our website.

<b>Who is collecting your personal information</b>	Your personal information is being collected by Returned & Services League of Australia (Queensland Branch) Redcliffe Sub Branch Inc t/a Redcliffe RSL. If you have any questions about our management of personal information, contact us: Email: enquiries@redcliffersl.com.au. Post: PO Box 34, Redcliffe QLD 4020. Telephone: 07 3897 6000.
<b>Collection of your personal information</b>	We collect personal information from you directly whenever you visit our Club as a member or guest. Additionally, when you use your membership card in our Club, we gather details about your interactions and usage of our services and amenities, including our leisure, gaming and entertainment offerings.
<b>The purposes for collecting your personal information</b>	We collect, use and disclose personal information as necessary for the successful operation of the Club. This includes verifying your identity; providing you with products and services, including leisure, entertainment and gaming offerings; maintaining our relationship with you; conducting promotional activities; addressing complaints; and complying with legal and regulatory requirements.
<b>What happens if we do not collect your personal information</b>	Your personal information is essential for processing your membership registration. Whether you're a guest or a member, it enables us to verify your identity and age, fulfilling necessary visitation requirements. Without collecting your personal information, we may not be able to maintain your membership status, grant access to our premises, communicate with you or offer our products or services, including participation in our loyalty or rewards points program.
<b>Who we disclose your personal information to</b>	We disclose your personal information to RSL State Office RSL Queensland, Maxgaming and other like companies who operate monitoring and gaming services on our behalf, and to other third-party service providers for the purposes set out above.
<b>Overseas disclosure of your personal information</b>	We may sometimes need to share personal information overseas, for instance while using cloud computing services. Visit our Privacy Policy for more information on sharing personal information overseas.
<b>Access to and correction of your personal information</b>	Our Privacy Policy contains information about how you can access the personal information we hold about you and seek correction of that information.
<b>Privacy complaints</b>	Our Privacy Policy contains information about how you can make a complaint about how we handle or manage your personal information.