

# *Venue Privacy Policy*

## *Golf House Hotel*

May 2025

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# Privacy Policy

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## **1. We respect your privacy**

- 1.1 The Golf House Hotel (**the Venue**) respects your right to privacy and this policy sets out how we collect and treat your personal information.
- 1.2 “Personal information” is information we hold which is identifiable as being about you.

## **2. What personal information we collect**

- 2.1 We may collect the following types of personal information from you:
  - (a) name;
  - (b) phone number;
  - (c) information about the Venue’s goods or services you have been supplied with;
  - (d) information from enquiries you have made;
  - (e) communications between us and you;
  - (f) credit card information;
  - (g) email address;
  - (h) date of birth;
  - (i) trade promotions you have participated in;
  - (j) information required to be included in gaming/alcohol/AML/CTF registers.
- 2.2 In some instances we may collect “sensitive information”, for example:
  - (a) information about your health or disabilities for the purpose of ensuring your safety at the Venue;
  - (b) people who work with children at the Venue are required to have a working with children check; and
  - (c) employees may be required to provide police checks.

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

- 3.1 We collect your personal information by extracting information from a variety of sources, including:
  - (a) loyalty program applications and renewals;
  - (b) electronic or personal interaction with us;
  - (c) when you access our website;
  - (d) when we provide goods and services to you;
  - (e) when you use your loyalty program cards at the Venue;
  - (f) entry forms for trade promotions, and loyalty programs;
  - (g) documents from which we obtain information we are required to collect

to comply with our:

- (i) Responsible Service of Gambling Policy;
- (ii) AML/CTF Program; and

(h) information provided directly by employees; and

(i) CCTV footage.

3.2 If you use a loyalty card scanner, the scanner will record all the information on the card.

3.3 We take reasonable steps to ensure that your personal information is secure.

#### **4. Use of your personal information**

4.1 We use your information to:

- (a) provide goods and services to you;
- (b) comply with our legal obligations including under the following legislation:
  - (i) Liquor Control Reform Act;
  - (ii) Gambling Regulation Act;
  - (iii) AML/CTF Act;
  - (iv) Public Health and Wellbeing Act; and
- (c) conduct our loyalty programs and to provide you with the benefits of those programs;
- (d) send you direct marketing material from the Venue only when you have agreed to receive it and have not opted out;
- (e) improve our services and notify you of opportunities that we think you might be interested in; and
- (f) contact you regarding unclaimed gaming winnings, lost property, incidents at the Venue.

4.2 We do not provide your information to third parties, except when required by:

- (a) police and other law enforcement agencies;
- (b) VGCCC personnel;
- (c) VLC personnel;
- (d) AUSTRAC;
- (e) our business partners who assist us in the provision of our goods and services and who must handle the information in accordance with the Privacy laws.

4.3 As far as is possible, we allow you to remain anonymous or pseudonymous when you deal with us.

4.4 The information collected by us for KYC processes under our AML/CTF Program is kept for at least for 12 months or longer as required by:

- (i) the VLC,
- (ii) AUSTRAC, which requires 7 years, &/or

(iii) the VGCCC, which is generally 3 years.

4.5 Information collected for the purposes of loyalty program participation and our databank is kept in the Venue's archives until it is no longer required.

## **5. CCTV**

5.1 We use CCTV footage to:

- (a) discharge our duty to ensure the safety of all staff, patrons and other persons who enter our Venue;
- (b) to identify potential criminal activity;
- (c) to meet our duties under our RSA and RSG codes of conduct and AML/CTF program, copies of which are available on request;
- (d) to ensure that self-excluded or banned persons do not enter or remain in areas from which they are excluded or banned;

5.2 It is mandated by law that gaming venues record and store CCTV footage for a minimum of 28 days. It is a condition of entry into our Venue that entrants consent to their image being captured, viewed and used for the purposes set out above.

5.3 No earlier than 28 days after collection, images collected by CCTV automatically expire and are not assessable on expiration, unless they are required to be kept for a lawful purpose.

## **6. Disclosure of your personal information overseas**

We do not disclose your personal information to overseas recipients.

## **7. Security of your personal information**

7.1 We take reasonable steps to protect your personal information from unauthorised access. However, we are not liable for any unauthorised access to this information.

7.2 We destroy or de-identify your personal information when it is no longer required for the purpose we collected it – see discussion above.

## **8. Access to and correction of your personal information**

8.1 Generally, you can access your personal information by contacting the Venue's Manager whose contact details are listed below. We may charge a reasonable administration fee for this access.

8.2 We may refuse you access to your personal information in the following circumstances:

- (a) giving you access would pose a serious threat to the life, health or safety of any individual or to public health or public safety; or giving access would have an unreasonable impact on the privacy of other individuals;
- (b) the request for access is frivolous or vexatious;
- (c) the information relates to existing or anticipated legal proceedings;
- (d) giving access would prejudice negotiations we are having with you;
- (e) giving access would be unlawful;

- (f) giving access would impede an investigation into serious misconduct or suspicious matters; or
  - (g) giving access would reveal material that is commercially sensitive for the Venue.
- 8.3 We will respond to any request for access to personal information within a reasonable time and if we do not give you access, we will tell you why.
- 8.4 We provide access to personal information to only:
  - (a) the person to whom it relates; and
  - (b) persons or organisations which have a legal right to access.

## **9. Complaints about privacy and access refusal**

- 9.1 If you have any complaints about our privacy practices or being denied access to your personal information, you should send details of your complaints to the Venue's Manager. We take complaints very seriously and will respond promptly (usually in less than 30 days) after receiving written notice of your complaint.
- 9.2 If you are still unsatisfied you can refer your complaint to the Information Commissioner at [www.oiac.gov.au](http://www.oiac.gov.au).

## **10. Changes**

- 10.1 We review this Privacy Policy from time to time and we may change this Privacy Policy in the future. If you would like to make comments about our Privacy Policy, please direct them to the Venue's Manager.
- 10.2 Revised versions of the Privacy Policy will be uploaded onto our website, so please check back from time to time.

## **11. When you visit our website**

- 11.1 When you come to our website we may collect certain information such as browser type, operating system, websites visited immediately before coming to our site, etc. This information is used in an aggregated manner to analyse how people use our site, so we can improve our services.
- 11.2 As is very common, we may use cookies on our website. Cookies are very small files which a website uses to identify you when you come back to the site and to store details about your use of the site. Cookies are not malicious programs that access or damage your computer.
- 11.3 Our site has links to other websites not owned or controlled by us. We are not responsible for these sites or the consequences of you going to those sites.

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### Contact Details:

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Venue Name [THE GOLF HOUSE HOTEL](#)