

# **Club Laverton Privacy Policy**

We respect your personal information at CLUB LAVERTON 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 that can identify a person. CLUB LAVERTON has 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.

## **1. Compliance with the Privacy Legislation**

CLUB LAVERTON is committed to protecting the privacy of individual's 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 of Personal Information**

CLUB LAVERTON only collects personal information that is necessary for us to provide one of our many business functions or activities. Personal details such as your name and address will only be collected where we have a clear business reason to do so, such as providing products and services to you. We will only collect information from you directly from your use of our products and services.

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 legislation, which requires personal information to be collected to verify your identity.

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 our other services from across our group that you may be interested in.

## **3. Types of Personal Information Collected**

CLUB LAVERTON offers a diverse array of hospitality experiences including bistro, sports bar, electronic gaming & sporting facilities, 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, 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 and bank details.

#### **4. Use and Disclosure**

CLUB LAVERTON will only use or disclose personal information for the purpose which was either specified or reasonably apparent at the time of collection. We may also use or disclose it for other related purposes for which you would reasonably expect it to be used.

CLUB LAVERTON does not generally disclose personal information to third parties except:

- where third party contractors appointed by CLUB LAVERTON require access to personal information held by us to perform services for us or on our behalf;
- where CLUB LAVERTON is required or authorised by law; or
- with your consent.

Should third parties be given access to personal information, CLUB LAVERTON requires that our contractors are obliged to keep that personal information confidential and not to use or disclose it for any purpose other than performing services for us or on our behalf.

CLUB LAVERTON does not disclose personal information to any overseas recipients.

#### **5. Marketing**

Given CLUB LAVERTON offers a diverse array of hospitality experiences, we would like to inform you of our products and services from time to time. CLUB LAVERTON 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.

We may conduct these marketing activities via email, telephone, SMS, social media or other such means. CLUB LAVERTON will generally only send you marketing material on an 'opt-in' basis. If you no longer wish to receive the material, we will always 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. Web Site Users**

CLUB LAVERTON may collect "clickstream" information (eg which areas of the website you have accessed, the time and date of access, the type of browser software used) from your use of the websites. We may also store "cookie" information (such as user preferences relating to your use of the website) on your computer. That information is used to customise and improve our websites.

CLUB LAVERTON 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. Security of Personal Information**

CLUB LAVERTON will take reasonable steps to protect the personal information it collects from misuse, loss, unauthorised access or disclosure.

There are a number of different ways we take care of your personal information. Information is 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. Our employees are required to maintain the confidentiality of any personal information held by CLUB LAVERTON and all information that is stored by a third parties are covered by contractual arrangements.

Once the personal information is no longer required, we will ensure measures are taken to destroyed or de- identified your personal information.

## **8. Seeking Access**

You have the right to access personal information that CLUB LAVERTON 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 Club Laverton 15 Aviation Rd . Laverton Vic. 3028.

## **9. Changing Information**

We will 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 Club Laverton 15 Aviation Rd . Laverton Vic. 3028 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 Club Laverton 15 Aviation Rd . Laverton Vic. 3028 or by application to the Office of the Australian Information Commissioner at GPO Box 5218, Sydney NSW 2001.

## **11. Amendments to this Policy**

CLUB LAVERTON may amend this Privacy Policy from time to time at its discretion.

## **12. Questions About Privacy**

If you have any questions or concerns about CLUB LAVERTON collection, use or disclosure of your personal information, please contact CLUB LAVERTON .

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).