



TWIN TOWNS SERVICES CLUB PRIVACY POLICY

Twin Towns Services Club has a strong commitment to privacy and the safeguarding of the personal information it collects. We will ensure that personal information is managed in an open and transparent way. Twin Towns Services Club Limited (Twin Towns Services Club) is bound by the provisions of the Privacy Act 1988, which governs the way private sector organisations collect, use, keep secure and disclose personal information. The Privacy Act contains 13 Australian Privacy Principles (APP's) that set standards for the handling of personal information.

DEFINITIONS

Personal information means information we hold about you from which we can search for and retrieve your identity.

Sensitive information is a subset of personal information and includes but is not limited to information about an individual's membership of a professional or trade association, membership of a trade union, criminal record or health information about an individual.

THE KINDS OF PERSONAL INFORMATION WE COLLECT AND HOLD

Twin Towns Services 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.

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

The type of information we may collect and hold from you generally includes your name, address, date of birth, occupation, contact details including email address, phone number, transaction history, photograph and in some cases credit card and bank account details. In general, you consent to us using and disclosing your personal information to facilitate a purpose in connection with:

- Membership and internal sections management purposes.
- Recruitment and employment.
- Financial details such as your tax file number if you are a staff member
- Health Information if you are an employee
- Financial management and administration.

- Meeting statutory requirements under legislation.
- Direct marketing that helps us build a stronger relationship with you.

HOW WE COLLECT AND HOLD PERSONAL INFORMATION

Depending upon the reason for requiring the information, some of the information we ask you to provide may be identified as mandatory or voluntary. If you do not provide the mandatory information we may be unable to provide our services to you.

Twin Towns Services Club may give/receive personal information about you to/from its Internal Sections/Member Clubs (being those Clubs who are members of the Twin Towns Services Club Limited organisation), including but not limited to our Internal Sections/Member Clubs annual reports, your membership details with the Internal Sections/Member Clubs and submissions you may make to them.

Personal information we collect and store is stored within our data storage devices, accessible by authorised staff and computers, and is protected by multiple layers of authentication. In certain cases, personal information may be stored on 3rd party databases. In these cases, it is encrypted in transit and authentication is required to access it, however 3rd party providers may use your personal information to market services and products to you directly independently of Twin Towns Services Club Limited without our knowledge or consent.

THE PURPOSES FOR WHICH WE COLLECT, HOLD, USE AND DISCLOSE PERSONAL INFORMATION

Twin Towns Services Club will collect your personal information in order to provide you with, or give you access to, a particular Twin Towns Services Club product or service. We will only use or disclose your personal information for the primary purposes for which it was collected or as consented to. In the event we propose to use or disclose such personal information other than for reasons detailed within this policy, we will first seek your consent, where it is required, prior to such disclosure or use.

Twin Towns Services Club may use the personal information we collect from you to identify particular Twin Towns Services Club products and services, which we believe may be of interest and benefit to you, such as from third parties. This may include such activities as competitions, policy announcements, campaigns or to hear about shows and entertainment from Twin Towns Services Club.

We may then contact you to let you know about these products and services. If you do not wish to receive this marketing information from Twin Towns Services Club, please let us know.

There are other situations where we are compelled by law to disclose your personal information. The Club may also use or disclose personal information:

- When it is disclosed or used for a purpose related to the primary purpose of collection detailed and you would reasonably expect your personal information to be used or disclosed for such purposes.
- To relevant authorities if it reasonably believes that there is a threat to an individual's life, health or safety, or public health or safety; or

- If we have reason to suspect that unlawful activity has been or is being, engaged in; or
- If it is required by law.

We may collect information about you because we are required or authorised by law to collect it. There are laws that affect licensed clubs, including the Corporations Act 2001 (Cth), Registered Clubs Act 1976 (NSW) and Anti-Money Laundering & Counter-Terrorism Financing Act 2006 (Cth), which require us to collect personal information. For example, we require personal information to permit you to join the Club or to use the Club's premises if you are not a member. Sometimes, we may be required to verify your identity under the Anti-Money Laundering & Counter-Terrorism Financing Act, Multi Venue Self Exclusion (MVSE) program or for exclusion purposes.

Further, the purpose of collecting your personal information is to undertake one or more of the following activities or functions:

- consider applications and renewals of membership;
- identify who comes to the Club and verify their details, including age and address;
- identify individuals who have been suspended, banned or self-excluded from the Club's premises;
- create registers and display information as required by the Registered Clubs Act;
- provide a safe environment for you, other members and guests and our staff;
- provide services to you, other members and guests;
- carry out accounting and finance requirements and legal and administrative reporting requirements;
- provide Wi-Fi at the Club;
- provide an events management service;
- operate functions at our venues;
- carry out competitions and promotions;
- perform gaming operations;
- publish and distribute newsletters;
- carry out marketing (including direct marketing);
- offer and manage sponsorships including by supporting community sports and social events;
- provide ticketing services;
- offer dining options and other entertainment, including shows;
- operate the Club's sub-clubs, including publishing contact details of committee members;
- conduct elections of the Board;
- investigate an incident or conduct disciplinary proceedings at or in connection with the Club;
- resolve a complaint;
- assess an applicant's suitability for employment;

- maintain a social record of the Club and its community, including sharing photographs of activities and functions at the Club via the Club’s website and social media pages;
- promote the objects of the Club; and
- improve our services and increase membership of the Club.

Is there surveillance at the Club?

All venues operated by the Club are subject to video and audio surveillance for security reasons, including to monitor the safety of members, guests and employees and to protect the Club’s assets. The footage and audio recordings may be used in disciplinary proceedings and/or to investigate incidents and may be disclosed to our legal representatives, our insurers and law enforcements agencies.

Will my face be subject to facial recognition technology at the Club?

It is likely that when you are at the Club’s premises, your face will be analysed by the Club’s facial recognition technology. Designated security cameras located throughout the Club’s premises use facial recognition technology to collect and analyse the “faceprints” of individuals. A “faceprint” is a set of characteristics used to uniquely identify an individual’s face and consists of information about the relative location, size and shape of an individual’s facial features. When you are at the Club’s premises, the Club’s designated security cameras will capture a photo of your face and then create a “faceprint” of your face based on that photo. Your “faceprint” will be matched against a database maintained by the Club that contains the “faceprints” of individuals who have been suspended, banned or self-excluded from the Club’s premises.

If your “faceprint” matches the “faceprint” of an individual who has been suspended, banned or self-excluded from the Club’s premises, senior Club staff will be alerted, and steps will be taken to remove you from the Club’s premises.

If your “faceprint” does not match the “faceprint” of an individual who has been suspended, banned or self-excluded from the Club’s premises, your “faceprint” will be deleted. For the purposes of enabling the “faceprint” matching referred to above, if an individual has been suspended, banned or self-excluded from the Club’s premises, the Club will collect a copy of that individual’s “faceprint” from a photo of that individual held by the Club (e.g. from the photo on the individual’s membership card) and will hold a copy of that “faceprint” for so long as the individual is suspended, banned or self-excluded from the Club’s premises.

Why does the Club use facial recognition software?

The Club has introduced facial recognition technology at all the Club’s premises to enhance the Club’s security procedures and assist the Club to identify and remove persons who have been suspended, banned or self-excluded from the Club’s premises. The collection of your “faceprint” is reasonably necessary for the activities and functions of the Club. The Club will not store your “faceprint” unless you have been suspended, banned or self-excluded from the Club’s premises.

A “face print” is a set of biometric characteristics (such as information about the relative location, size and shape of an individual’s facial features) which is used to uniquely identify an individual’s

face and is expressed as a mathematical algorithm. Your “face print” will then be compared against a secure database maintained by the Club that contains the “face prints” of individuals who have been suspended, banned or self-excluded from the Club’s premises.

If your “face print” does not match the “face print” of an individual who has been suspended, banned or self-excluded from the Club’s premises, your “face print” will be deleted.

Twin Towns Services Club may only use or disclose personal information for direct marketing purposes where the individual has provided consent or where an individual would have a reasonable expectation that their personal information will be used for this purpose and conditions relating to opt-out mechanisms are met. Occasionally, we may disclose your personal information for the purposes of facilitating the distribution of marketing material to you by Twin Towns Services Club by employing a third party. If you do not wish to receive marketing communications from us please contact us at Twin Towns Services Club.

Where unsolicited personal information is received by Twin Towns Services Club it will be afforded the same privacy protection as solicited personal information. Twin Towns Services 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.

Twin Towns Services 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.

DATA BREACH RESPONSE PLAN

Twin Town Services Club (TTSC) is committed to managing personal information in accordance with the Privacy Act 1988 (Cth) (the Act) and the TTSC Privacy Policy.

The purpose of the Twin Towns Services Club Limited Data Breach Response Plan is to set out procedures and lines of authority in the event that TTSC experiences a data breach (or suspects that a data breach has occurred). The Plan is intended to enable TTSC to contain, assess and respond to data breaches in a timely fashion and to mitigate potential harm to affected individuals.

The Privacy Amendment (Notifiable Data Breaches) Act 2017 (NDB Act) established a Notifiable Data Breaches (NDB) scheme requiring organisations covered by the Act to notify any individuals likely to be at risk of serious harm by a data breach. The Office of the Australian Information Commissioner (OAIC) must also be notified.

Accordingly, TTSC needs to be prepared to act quickly in the event of a data breach (or suspected breach) and determine whether it is likely to result in serious harm and whether it constitutes an NDB.

Adherence to the Procedure and Response Plan will ensure that TTSC can contain, assess and respond to data breaches expeditiously and mitigate potential harm to the person(s) affected.

The Procedure and Response Plan has been informed by:

- The Office of the Australian Information Commissioner’s “Guide to developing a data breach response plan.”
- The Office of the Australian Information Commissioner’s “Data breach notification guide: a guide to handling personal information security breaches.”
- NDB Act.
- The Act and Australian Privacy Principles (Schedule 1 of the Act).

WHO MIGHT TWIN TOWNS SERVICES CLUB DISCLOSE MY PERSONAL INFORMATION TO?

Twin Towns Services Club may disclose your personal information:

- to venue operators and to promoters of events for which you purchase tickets. Twin Towns Services Club discloses your personal information to such organisations for operational purposes and also because from time to time they may choose to provide you with information about their events. If you consent, these organisations may use this information to provide you with promotional and marketing material about their events via email. You may change your preference to receive email marketing at any time directly with the organisations which have obtained your information. If you do not have their details, you can contact Twin Towns Services Club **Show bookings staff directly**;
- to sponsors, sporting clubs, authorised ticket on-sellers and resellers who (unless they obtain a separate consent from you) use it for operational purposes only, for example, to provide you with additional information about the event or venue that you are attending;
- to other Twin Town Services Club companies, internal clubs and contractors (such as data management providers). Twin Towns Services Club group of companies include Twin Towns Services Club, Club Banora, Twin Towns Juniors, Twin Towns Resort and any entities that may in future become part of the Twin Towns Services Club group of companies or in which Twin Towns Services Club may have an interest. Twin Towns Services Club may disclose your personal information to these entities for the purposes of, for example, ensuring that information collected is accurate, complete and up-to-date, producing anonymised and aggregated information for the benefit of other Twin Towns Services Club companies, and enabling us and other Twin Towns Services Club companies to better understand and meet your needs and interests.
- to third party contractors and service providers who help us operate our business or provide a service to you. Twin Towns Services Club may disclose your personal information to third party contractors and service providers who, for example, help us operate our computer systems, provide us with fraud prevention services, operate certain features accessible from our website, send out our mail/email and clean collected data and who perform data analysis to group demographic attributes of individuals.

Otherwise, Twin Towns Services Club will only disclose your personal information:

- where we are required to do so by law;
- if the disclosure is permitted under the Privacy Act 1988 (Cth); or

- if you have consented to the disclosure.

ACCESS AND CORRECTION

If we have accurate personal information about you, it enables us to provide you with the best possible service. If Twin Towns Services Club holds personal information about an individual and the individual is able to establish that the information is not accurate, complete and up to date, Twin Towns Services Club will take reasonable steps to correct the information so that it is accurate, complete and up to date. Twin Towns Services Club will respond to a correction request within a reasonable period after the request is made.

The Club will not generally refuse a request made by an individual to access their own personal information unless an exemption exists in accordance with the APP's. Written notification of reason (except where it would be unreasonable to do so in the circumstances) will be provided, if the Club refuses a request and, the options for that person to make a complaint about the Clubs decision.

Contact us if you think there is something wrong with the information we hold about you and we'll try to correct it if it's:

- inaccurate;
- out of date;
- incomplete;
- irrelevant; or
- misleading.

If you are worried that we have given incorrect information to others, you can ask us to tell them about the correction. We'll try and help where we can - if we can't, then we'll let you know in writing.

USING TTSC WEBSITES AND SOCIAL MEDIA PAGES

The website and social media pages operated by or in connection with us may collect personal information for the purposes outlined in this policy. Any information collected by us as a result of your use of those websites and pages will be handled in accordance with this policy. Those websites and pages may also use cookies and contain hyperlinks to other websites and pages, including those operated by third parties. Any hyperlinks are provided for reference only. We do not have control over websites and pages operated by third parties and are not responsible for the content available on such websites or pages or the privacy practices of those third parties. There will also be instances when dealing with TTSC's websites where you will be redirected to a third party's website or platform. For example, you will be redirected to a third-party payment platform if you wish to make an online payment. Generally, we do not have control over these third-party providers and how they collect and handle any personal information that you provide to them. We also typically have limited access to the information they collect and hold. TTSC does not accept any liability for the action of any such third-party providers. We strongly encourage you to read a third party's privacy policy as it will likely contain provisions which are specific to

the third-party's activities and functions. For instance, a third-party payment platform provider will likely collect your billing and financial details and may disclose your financial information with your bank to verify your identity, to verify the information you have provided, to process your transaction and to advise us whether your payment has been successful.

DATA QUALITY AND SECURITY

The personal information that we collect will be kept safe and secure. Twin Towns Services Club has implemented systems to ensure that personal information stored on our networks is protected by authentication log in procedures. The Club runs advanced malware protection systems and will take reasonable steps to protect personal information from misuse, interference and loss, unauthorised access, modification, destruction and disclosure.

HOW A PERSON MAY ACCESS FURTHER INFORMATION OR COMPLAIN ABOUT A BREACH OF PRIVACY

Twin Towns Services Club take complaints about a breach of privacy seriously. If you believe that we have breached your privacy or have any questions in relation to this Privacy Policy, you can contact the Privacy Officer on:



P.O. Box 369, TWEED HEADS, NSW 2485



+61 7 5599 0267



Compliance@twintowns.com.au



We will investigate any complaint and notify you of our decision in relation to the complaint, as soon as practicable after it is received.

10. AVAILABILITY OF THIS POLICY

This policy or an approved form thereof will be displayed and maintained on the Clubs Website and made available free of charge upon request.

If you require any further information, please contact the Club Administration.

Signed

Rob Smith CEO