



## Privacy Policy of Castle Hill RSL Club Limited and related entities

**Issue Date: February 15, 2023**

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### Who does this policy apply to and what does it cover?

This policy sets out how Castle Hill RSL Club Limited and its related entities (“**CHRG**”, “**we**”, “**us**” or “**our**”) collect, use, disclose and hold “personal information”.

“Personal information” means information or an opinion about an individual (who can reasonably be identified), whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not.

Please note that CHRG owns and operates several clubs and other businesses under a number of different trading names and brands, including:

- Castle Hill Bowling Club
- Castle Hill RSL Club;
- Castle Hill Fitness & Aquatic Centre;
- Club Parramatta;
- Lynwood Golf and Country Club;

Those businesses’ operations are also covered by this policy, as explained in the FAQ section below.

### What is our privacy commitment to you?

We are committed to complying with our obligations under the *Privacy Act 1988 (Cth)* (**Privacy Act**) by protecting the privacy and confidentiality of your personal information.

When we collect, use, disclose, store, access or correct your personal information, our actions will comply with the Privacy Act and the *Australian Privacy Principles*.

Where appropriate, we will handle your personal information relying on the employee records exemption and the related bodies corporate exemption in the Privacy Act.

### What kinds of personal information does CHRG collect and hold?

We may collect and hold a wide range of personal information, and in some cases sensitive information, including:

- your personal details, including your full name, residential address, email address, contact number, date of birth, gender and occupation;
- your signature;
- information related to your entry to Club premises;

- a photo of you for your membership card;
- an image of your driver's licence or other identification if you choose to scan your ID when entering CHRG's premises, including any information obtained from that identification (you have the option not to have your ID scanned and for the required information to be manually inputted into CHRG sign-in technology);
- details of your membership of CHRG, including any positions held by you at CHRG or any complaints made by you or against you in connection with CHRG;
- information about what goods or services you buy or receive from CHRG;
- details of your activities at or in connection with CHRG, including your participation in social, sporting or other organised activities;
- health information, including any medical conditions that you may disclose to us to enable us to provide goods or services or access to our facilities to you, in particular in connection with the Castle Hill Fitness & Aquatic Centre and our sporting clubs;
- the name and contact details of your next of kin;
- information connected to your use of our gaming machines (including your player activity statements and any prizes you receive);
- information about you related to a liquor or gaming self-exclusion or banning order about you from yourself, other clubs, BetSafe, TAB, ClubsNSW, a Liquor Accord or Liquor & Gaming NSW;
- things you say or do (or things said about you) in connection with an incident or potential disciplinary proceedings at or in connection with CHRG;
- your payment details, including your bank account details and credit card details, where you have applied for a direct debit or other financial arrangement with CHRG;
- information about your use of our websites and social media pages, including your IP address, and any information collected by cookies as a result of your use of our websites and social media pages;
- your location if you install and use the Castle Hill Fitness App;
- information related to your use of our Wi-Fi from any of your personal devices;
- if you apply for a job with us, the information in your resume, information about your qualifications, information about your immigration status and other information that you or your referees provide to us and notes of our interactions with you and/or others in relation to your prospective employment.

From time to time, we may collect additional information about you related to surveys, promotions and particular services or activities at or in connection with CHRG.

Wherever practicable, we will advise you of the information being collected about you and provide you with an opportunity to refuse the collection of that information.

## How do we collect your personal information?

Your personal information is collected as a result of your visits to, or dealings with, CHR.G. Information is collected by recording information that you provide to us, by electronic means, and by the observations of our staff. We collect personal information when you:

- enter, visit or deal with CHR.G and any of our venues;
- apply for, or renew, your membership of CHR.G and our related entities or request to use our services;
- use your membership card at or in connection with CHR.G;
- purchase goods or services from us;
- use our gaming machines or request to be excluded from using our gaming machines;
- enter into a liquor self-exclusion agreement with us, or otherwise participate in a liquor self-exclusion program and nominate to exclude yourself from all or part of our premises;
- install, access or use a CHR.G App, Castle Hill Fitness App and any other apps or web-based technology used by CHR.G and/or our related entities;
- access or use our Wi-Fi from any of your personal devices;
- attend a function or show at a venue we operate;
- plan an event to be held with us;
- apply for a direct debit or other financial arrangement with CHR.G;
- participate in activities offered by CHR.G, including competitions and promotions;
- visit one of the websites or social media pages operated by CHR.G;
- are suspended, banned or removed from any part of CHR.G's premises or other venues;
- receive or request sponsorship through programs such as ClubGRANTS;
- are involved in, witness or are connected to an incident or disciplinary proceedings at or in connection with CHR.G;
- apply for, or renew, your membership of one or more of CHR.G's sub-clubs or participate in the activities of those sub-clubs;
- apply for a job with us; and/or
- subscribe for information and updates about our proposed residential lifestyle development for retirees.

In general, if you contact us, we may keep a record of that correspondence.

We only collect personal information about you from you (or if you are under 15 years of age, from your parent or legal guardian), unless it is unreasonable or impractical to do so. For example, it may be unreasonable or impractical to collect information from you (or your parent or legal guardian if you are under 15 years of age) when the information is provided by other members, our staff or the Police.

We may also collect information about you from other clubs and industry bodies if you have excluded yourself from CHRГ's premises as part of a liquor or gaming self-exclusion agreement or program (including in relation to the TAB and "BetSafe" self-exclusion systems).

### **Will I be notified that my personal information is being collected?**

When we collect information from you, we will take reasonable steps to notify you (or otherwise ensure that you are aware) of the following:

- our identity and contact details;
- the facts and circumstances of the collection;
- details of any laws that require or authorise the collection;
- the purposes of the collection;
- the consequences if we do not collect the information;
- that this policy contains information about how you can access or correct your information or make a complaint about CHRГ; and
- whether we are likely to disclose the information overseas (and, if so, to which countries).

One way we notify you of the above is by making you aware of this policy.

If you give us personal information about others, we expect that you will tell them about this policy.

### **Is CHRГ required by law to collect personal information?**

As a registered club, we have a legal responsibility to collect certain information about our members and guests pursuant to legislation, including the *Registered Clubs Act 1976* (NSW) (**Registered Clubs Act**), *Corporations Act 2001* (Cth) (**Corporations Act**), *Gaming Machines Act 2001* (NSW), *Liquor Act 2007* (NSW), *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) and *Work Health and Safety Act 2011* (NSW).

For example, when a person applies for membership of CHRГ, we must collect details including their name and address. We must display a person's name on CHRГ's notice board before our Board is able to consider the application for membership. We also may need to provide this information to any member of the general public who makes a request under certain legislation, including the Corporations Act.

Temporary members, guests of members and other visitors to CHRГ may be required to produce a recognised form of identification (such as a driver's licence or passport) to gain entry into the licenced premises.

If you elect to use our electronic ID scanners, we will collect information from your ID at the time you enter CHRГ's premises. More information about our electronic ID scanners appears in our Frequently Asked Questions section below.

### **For what purposes does CHRГ collect, hold, use and disclose your personal information?**

We collect, hold, use and disclose your personal information to operate CHRГ and its various businesses, carry out certain activities, provide products and services to you, other members and guests and other members of the public, and comply with our legal obligations. 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 with CHRГ
- identify who comes to CHRГ's premises and verify their details, including age and address;
- identify individuals who have been suspended, banned or self-excluded from CHRГ's premises;
- create registers and display information as required by the Registered Clubs Act;
- provide a safe environment for you, other members, guests and our staff;
- provide services to you, other members and guests;
- assess your suitability to participate in certain activities and services provided by CHRГ, having regard to your state of health and fitness;
- carry out accounting, financial and administrative activities and functions and comply with our legal and administrative reporting requirements;
- provide Wi-Fi at CHRГ's premises;
- 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 CHRГ'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 CHRG;
- resolve a complaint;
- assess an applicant's suitability for employment;
- improve our services and increase membership of CHRG; and/or
- provide you with updates and information about our proposed residential lifestyle development for retirees.

### **What happens if you don't provide your personal information?**

If you don't give CHRG your personal information, you may not be able to become a member of CHRG, use CHRG's services or facilities, or access CHRG's premises and other venues. If you provide us with some but not all of the information sought, then, depending on the information withheld, we may be able to provide you with certain goods and services but only to a limited extent. For example, if you disable cookies on our websites, certain features and functions on our websites may not work. You have the option of not identifying yourself, or of using a pseudonym, when dealing with us. However, this will be limited to enquiries of a very general nature and only over the telephone or by email.

In most circumstances, you will be unable to deal with CHRG anonymously or with a pseudonym because of our obligations under the Registered Clubs Act.

### **How do we use your personal information?**

We use your personal information primarily to allow us to carry out the activities and functions listed above. We also use your personal information for secondary purposes related to those activities and functions, or when permitted under the Privacy Act.

If you have self-excluded yourself from CHRG's premises and nominated other clubs or licensed premises from which you also want to be excluded, we may disclose your personal information to the exclusion program operator (if any) and/or to the clubs and licensed premises that you have nominated directly to the extent necessary to assist those clubs and licensed premises to comply with your self-exclusion.

To the extent that CHRG collects health information from you, CHRG will treat that information as confidential and only ever handle your health information in accordance with CHRG's policies, the Privacy Act and the *Health Records and Information Privacy Act 2002* (NSW).

CHRG may also use the personal information we collect from you for direct marketing of products and services to you, including from third parties. Such products and services may include the provision of newsletters, competitions, announcements, campaigns or information about shows and entertainment at CHRG or services offered by CHRG.

You can refuse any direct marketing by opting out of direct marketing material on your membership application form, by updating your preferences on your account, by selecting unsubscribe on any marketing emails from CHRG to you or by otherwise contacting our Privacy Officer.

## **Does CHRГ disclose my personal information to others?**

There may be times when we may need to disclose your personal information to third parties that we engage to provide services to or in connection with CHRГ, including our related entities, our insurers, our sponsors, our legal or financial advisers and other Club members.

Your personal information will only be disclosed to third parties for a purpose permitted by the Privacy Act and/or this policy and, where required, after obtaining your consent.

We may need to disclose your personal information to third parties for the purposes of allowing us to carry out the activities and functions mentioned in this policy.

For example, from time to time, CHRГ engages external companies to send direct marketing information (usually via email or SMS), carry out mail services, and provide IT storage and other services.

A third party will only receive your personal information from CHRГ where that information is necessary for that third party to provide services to or in connection with CHRГ and CHRГ will always require that the third party comply with the Privacy Act when dealing with your personal information.

We will also disclose your personal information to third parties if we are required or authorised to do so by law, including to law enforcement agencies, the Office of the Australian Information Commissioner, the Australian Electoral Commission, the Department of Communities and Justice and the Australian Taxation Office.

CHRГ will never disclose your health information to a third party without your express consent, except in the event of a medical emergency or as otherwise permitted by law.

## **FREQUENTLY ASKED QUESTIONS**

### **How does this policy apply to CHRГ's other businesses, its sub-clubs and its related entities?**

CHRГ operates multiple clubs and businesses which trade under different names and brands, including but not limited to Castle Hill RSL, Club Parramatta, Castle Hill Fitness and Aquatic Centre, Lynwood Golf and Country Club and Castle Hill Bowling Club.

CHRГ also operates a number of sub-clubs (or "interclubs") that form part of CHRГ.

For the purposes of the Privacy Act, a collection, use, disclosure or storage of your personal information by one of CHRГ's businesses which trades under a different business name or by one of CHRГ's sub-clubs is CHRГ's collection, use, disclosure or storage of your personal information.

If a business of CHRГ which trades under a different business name or a sub-club (being part of CHRГ) collects, uses, discloses or stores your personal information, it will comply with this policy when doing so.

CHRГ may have one or more related entities, also known as "related bodies corporate".

These related entities are separate legal entities to CHRГ, but are related to CHRГ in some way (e.g. CHRГ owns the related entity, or the related entity owns CHRГ).

The Privacy Act permits related entities to share personal information in certain circumstances.

If an entity related to CHRГ collects, uses, discloses or stores your personal information, it will comply with this policy when doing so (unless that entity has its own privacy policy).

### **Why does CHRГ collect my health information?**

CHRГ's primary concern is the safety and wellbeing of its staff, members and the broader community which it serves.

CHRГ may need collect personal information from you about your health in order to safely provide specific services to you. For example, if you wish to participate in a sporting activity operated by one of CHRГ's sub-clubs, CHRГ may require you to disclose information about your general fitness and any medical conditions that you may have in order to assess whether it is safe for you to participate in that activity. Similarly, if you join the Castle Hill Fitness & Aquatic Centre, or participate in other forms of sport offered by CHRГ, CHRГ may require your information to assess your level of fitness and determine what programs are appropriate for you.

CHRГ will only ever collect your health information from you directly (or if you are under 15 years of age, from your parent or legal guardian) and with your (or your parent or guardian's) express consent. CHRГ recognises that health information is sensitive information and will only handle your health information in accordance with CHRГ's policies, the Privacy Act and the *Health Records an Information Privacy Act 2002* (NSW).

### **Is there surveillance at CHRГ?**

All venues operated by CHRГ are subject to video surveillance for security reasons, including to monitor the safety of members, guests and employees and to protect CHRГ's assets.

The footage may be used in disciplinary proceedings and/or to investigate incidents and may be disclosed to our legal representatives, our insurers and/or law enforcements agencies.

### **Do I have to use the electronic ID scanner to enter CHRГ's premises?**

No. You are not obliged to scan your identification to enter CHRГ's premises.

If you prefer, you can request our staff to manually enter your name, address and signature (as required by the Registered Clubs Act) into the system and present your identification to staff who will confirm your details.

### **What information is collected from the electronic ID scanners?**

The electronic scanners used by CHRГ use Circlescan software to collect your name, address, date of birth, signature and photograph from your ID.

### **Why does CHRГ use ID scanners?**

Under the Registered Clubs Act, we are required to maintain a register of the name, address and signature of temporary members and guests over the age of 18 who enter CHRГ's premises. This information must be retained by us for at least three years.

We are also required to take steps to verify the identity of any members and guests who use our gaming machines under the Anti-Money Laundering and Counter-Terrorism Financing Act and its associated rules and regulations.



ID scanners are a secure way for CHRG to collect information about persons entering CHRG's premises.

ID scanners are also environmentally friendly in that they have helped CHRG reduce its paper usage and storage of certain hardcopy records.

The collection of personal information of the individuals who choose to scan their identification is reasonably necessary for the activities and functions of CHRG.

### **How do we hold and protect your personal information?**

Personal information that is held by us is stored electronically and/or in hardcopy.

We take reasonable steps to ensure that your personal information is safe and secure from unauthorised access, use or disclosure.

Information that we store electronically is held in secure and password protected databases.

Video surveillance is stored on our digital recorders, which are maintained in a restricted access area and password protected.

CHRG does not store your financial information unless you have submitted a hard copy direct debit form with us. Paper forms are kept secure on CHRG's premises.

Your personal information is securely destroyed when it is no longer needed or when it is out of date.

### **What happens if my personal information is involved in a data breach?**

CHRG has various security measures in place to protect your personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure.

In the event that CHRG's security measures are compromised and your information is the subject of a data breach, CHRG will comply with its obligations for responding to data breaches outlined in the Privacy Act.

Upon becoming aware of a data breach, CHRG will take urgent steps to contain the breach, mitigate any risk of harm and determine who may have been affected by the breach.

CHRG will then assess the breach, including any potential for harm, and determine whether the breach is likely to result in serious harm to any person whose data was involved.

If CHRG has reasonable grounds to believe that the breach is likely to result in serious harm to you, CHRG will notify you of the breach as soon as possible. CHRG will also notify the Office of the Australian Information Commissioner of the breach.

Following a breach, CHRG will conduct a review of its security measures and implement any additional measures it considers necessary to enhance the security of your information.

### **Are we likely to disclose personal information overseas?**

It is unlikely that we will disclose your personal information overseas. However, if you agree to information being put on our websites or social media pages then this could be accessed by other countries.

Our primary servers are stored locally at CHRG's premises.

We also occasionally use software and secure cloud servers, which may also involve the use of servers that may be located in other countries and may also constitute a disclosure under the Privacy Act.

CHRG will always require that any third party software and storage providers who are based overseas comply with the Privacy Act when dealing with your personal information.

### **Why does CHRG have web-based technology (such as an app) and how does it work?**

If you are a member of CHRG, you have the option of using web-based technology, including apps, on your mobile phone or other compatible device to access information about CHRG, including Club promotions.

Some of CHRG's businesses' use or provide you with the option of using an app which is operated by a third-party. For example, the Castle Hill Fitness & Aquatic Centre uses the CH Fitness app for a variety of functions, including enabling you to schedule classes, track your fitness and follow your program.

These apps are owned by third parties and used by CHRG pursuant to a software licence. CHRG generally, has limited control over how these apps collect, use, store and disclose your personal information. If you wish to use a third-party app, CHRG recommends that you read the app's privacy policy before installing and registering with the app, as CHRG will not be liable for the privacy practices of the third party.

### **Using CHRG's websites and social media pages**

The websites 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 CHRG'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. CHRG 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.

**What does this policy mean?**

By entering, visiting or dealing with CHRG, you consent to the terms of this policy.

CHRG will also seek your express consent for the collection, use or disclosure of your personal information for purposes set out in this policy wherever reasonably practicable.

From time to time, your additional consent will be sought for the collection, use or disclosure of your personal information for purposes other than as set out in this policy.

If you do not agree to this policy or do not wish to receive direct marketing information from or in connection with CHRG, please contact our Privacy Officer.

**How do I access, update or correct the personal information held by CHRG about me?**

You have a general right to access any personal information which we hold about you. You can request access to the personal information we hold about you by contacting our Privacy Officer.

We will not charge you for making the request. However, we may need to charge you for our time to answer your request. We will advise you in advance if there are to be any charges associated with complying with your request.

We will respond to your request within a reasonable timeframe (usually not more than 30 days).

When you request access, we may need further information from you to verify your identity.

There are a number of reasons why we may be unable to give you access to your personal information held by CHRG. If we are not able to provide access, we will provide you with written reasons.

If you believe any of the personal information that we hold about you is incorrect or out-of-date, you can ask us to correct it and we will take reasonable steps to ensure that it is accurate, up-to-date, relevant and not misleading. To assist us to update your information, we may need you to provide us with evidence of your new details.

If we refuse to correct your personal information, we will give you written reasons.

**How do I make a complaint about privacy to CHRG?**

If you believe we have breached the Privacy Act or any of the *Australian Privacy Principles*, or if you have any issues about CHRG's collection, use, disclosure or storage of your personal information, please contact our Privacy Officer.

When contacting our Privacy Officer, please give us enough details to be able to identify you, understand your issue or complaint and respond appropriately.

We will respond to you within a reasonable timeframe (usually not more than 30 days).

If you are unhappy with how we handle your issue or complaint, you are entitled to make a privacy complaint to the Office of the Australian Information Commissioner.

### **How do I contact the Privacy Officer at CHRG?**

You can contact the Privacy Officer by:

Phone: 02 8858 4800

Email: [privacy@chrg.com.au](mailto:privacy@chrg.com.au)

Post: The Privacy Officer  
Castle Hill RSL Club  
77 Castle Street  
Castle Hill NSW 2154

### **How do I contact the Office of the Australian Information Commissioner?**

Please visit the Office of the Australian Information Commissioner's website for contact details: <https://www.oaic.gov.au/>.