northscollective

PRIVACY POLICY

North Sydney Leagues' Club Limited (**Norths Collective, we** or **us**) is committed to protecting our patrons' privacy through compliance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles.

Norths Collective covers the whole group and includes The Alcott Lane Cove, Seagulls Tweed Heads, Norths Cammeray, The Greens North Sydney, The Verandah Beecroft, The Glasshouse Artarmon, The Bowlo Bangalow and Molly's Pavilion Cheltenham.

This policy applies to personal information collected from and about members and guests, other customers, staff, suppliers and any other person whose personal information we may collect from time to time (**you**). It does not apply to Norths Collective's treatment of employee records, which are directly related to a current or former employment relationship between Norths Collective and an employee.

By accessing our website at https://northscollective.com.au (**Website**), accessing our Norths Collective application (**App**), using our goods and/or services or by otherwise providing your personal information to us, you confirm your acceptance of the terms of our Privacy Policy and consent to the handling of your personal information as set out in this Privacy Policy. If you do not agree with the terms of this Privacy Policy, please do not use our products, services, Website, App or otherwise provide us with your personal information.

PURPOSE

The purpose of this policy is to ensure that Norths Collective complies with the *Privacy Act 1988* (Cth) (**Act**) and the Australian Privacy Principles, which govern how organisations such as Norths Collective manage your 'personal information' (which in general terms is any information that can be used to identify you personally), and direct how information should be collected, used, managed and secured. The 2017 Amendment to the Privacy Act has also introduced the Notifiable Data Breach Scheme, which outlines responsibilities such as monitoring, responding, assessing, and reporting relevant information breaches. We will also undertake reasonable steps to ensure compliance with the General Data Protection Regulation (**GDPR**) where applicable.

Norths Collective's Privacy Policy provides an overview of what and why we collect, store and use the personal information that we receive or create about you.

This Privacy Policy will explain:

- How this policy applies to you
- The types of information we may collect about you, how it is collected and how we might use the information
- How we may disclose that information
- How you can access the personal information that we hold about you
- When we might use your information to contact you
- How we ensure the security of your personal information
- How we might use cookies, if any, to collect information on our Website and other digital platforms, and how you can control or delete these cookies
- How and why we collect additional information to improve our services.

PRIVACY POLICY

SECURITY OF PERSONAL INFORMATION

At Norths Collective we regard privacy of information seriously and take reasonable precautions to ensure the security of your personal information from misuse, interference, loss and unauthorised access, modification or disclosure; and how it is collected, kept secure, used and disclosed. This includes:

- Maintaining governance standards and security measures that prevent data breaches
- Ongoing monitoring of any potential breaches
- Containing any data breaches that may occur
- Assessing any potential serious harm that any breach may have on you
- Taking remedial action to minimise any harm arising from a data breach
- Notifying you of a data breach in the event that there is the likelihood for serious harm
- Reviewing any data breach incident including investigating the cause of the breach, developing prevention plans and adapting any findings to improve Norths Collective's processes and procedures.

WHY WE COLLECT AND HOLD PERSONAL INFORMATION

We may collect and hold your personal information to:

- Identify you and verify your identity
- Admit you to our premises, or process an application for membership (or renewal of such membership)
- Provide you access to our App
- Manage and control the quality of our services to you
- Market our services to you
- Undertake research and analysis related to our services in order to improve them
- Maintain security at our venues by collecting information from your driver's licence when you enter our venues or collecting your car number plate details when you park in the car park of one of our venues
- Identify individuals who have been self-excluded from our premises
- Assist you with enquiries or complaints
- Forward information relating to activities of Norths Collective including regulatory reports and notices to members
- Record, keep and update our members' loyalty bonus points
- Record, keep and update our player accounts
- Comply with our legal and regulatory obligations, for example, we may be legally required to collect personal information under the *Registered Clubs Act 1976* (NSW), *Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) Act 2006* (Cth), *the Corporations Act 2001* (Cth) and other legislation
- Develop new and/or improved products and services
- Analyse usage and performance of our Website or App

PRIVACY POLICY

WHY WE COLLECT AND HOLD PERSONAL INFORMATION (CONTINUED)

Norths Collective may collect personal information from minors and will respectfully limit the collection of such personal information to what is reasonably necessary to attend Tabatinga facilities or to participate in a Club event. Reasonable additional steps will be taken with regard to collecting personal information from minors. These include:

- Types of personal information collected from minors
- Limiting our collection of personal information from minors to no more than is reasonably necessary
- Restricted uses of the personal information
- Access to parents/guardians to correct or remove personal information relating to the minor
- Limiting access to our App, where appropriate

COLLECTION AND USE OF BIOMETRIC INFORMATION

Norths Collective has introduced facial recognition technology to enhance our security procedures, to assist us in identifying individuals who are suspended, banned or self-excluded from our premises and to authenticate and verify customer identities in a secure manner. The collection of your faceprint is reasonably necessary for the activities and functions of Norths Collective. A faceprint is a digitally recorded representation of an individual's face based on the location, size and shape of an individual's facial features.

Facial Recognition Cameras

When you are at Norths Collective, our designated security cameras will capture a photo of your face and then generate a faceprint of your face based on that photo. Your faceprint will then be compared against a database maintained by Norths Collective that contains the fingerprints of individuals who have been suspended, banned or self-excluded from our premises. Faceprints of any such suspended, banned or self-excluded individual from Norths Collective are initially collected through photographic images Norths Collective holds of that individual (for example, from that individual's membership card). If your faceprint matches the faceprint of any individual in this database, our staff will be alerted and you will be removed from our premises. Your faceprint will be deleted if it does not match the faceprint of any person whose faceprint is contained in the database.

Norths Collective stores the faceprints of those persons who have been suspended, banned or self-excluded from our premises for such time until the suspension, ban or self-exclusion ceases.

ID Scanners

When entering our premises, a photo of your face may be captured at the front desk and compared with the photograph presented on your photo identification card, digital driver's licence or membership profile.

Unless you inform us otherwise, we will destroy the biometric template created during this process upon completion of the identity verification process.

Your photograph is collected, stored and used in accordance with the entry requirements of our premises which is governed by the *Registered Clubs Act 1976* (NSW).

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PERSONAL INFORMATION WE MAY COLLECT AND HOLD

The kinds of personal information that Norths Collective may collect and hold about you depends on the nature of your dealings with us and the requirements of applicable laws, regulations, licence conditions and betting rules. Personal information we may collect and hold includes:

- Name
- Gender
- Email address
- Date of birth
- Occupation
- Home phone
- Mobile telephone number
- Residential address (street name, number, suburb, state and postcode)
- Postal address
- Identification documentation including driver's licence, passport, NSW photo card
- Faceprint
- Information for security purposes such as footage from CCTV surveillance and car registration details
- Health information required for participation at fitness facilities
- Members' activity information including gaming data and purchase history
- Information required for employment purposes
- Information required for event booking deposits, payments and booking including credit card or bank account details
- Personal information required for referrals of club membership, fitness centres and events
- Information required for marketing purposes

If you access our Website or App we may also collect additional information about you including your Internet Protocol (IP) address, domain name, type of operating system and browser, and your general area of location. If permitted, the App may access your camera to scan QR codes whilst in our venues. Our Website also uses cookies. Cookies do not identify you personally, but they may link back to a database record about you. Norths Collective uses cookies to monitor the usage of our Website and to tailor our Website to you.

HOW WE COLLECT AND HOLD YOUR PERSONAL INFORMATION

Norths Collective will collect your personal information from you in a number of ways, including through your membership registration, as you access our facilities and services, use or purchase our products and services, use your Norths Collective membership card, use your credit or debit card for purchases, enter into any of our competitions or promotions, use our Website or App, comment on or contribute to our social media sites, participate in our loyalty program, deal with us, or complete a survey or questionnaire issued in relation to us. This personal information is held on our software systems which are secure. Personal information collected electronically, including through our Website or App, is encrypted whilst transferred to and held on our software systems.

Whilst we strive to only collect personal information about you from you, there may be circumstances where it is unreasonable or impractical to do so. For example, it may be unreasonable or impractical to collect information from you when the information is provided by other members, our staff, a regulatory authority or the police. If you provide us with personal information about a third party, in doing so you will be representing to us that you have that third party's consent for us to collect and handle their personal information in accordance with this privacy policy – and we will be collecting the information on that basis.

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HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION

Personal information collected and held by Norths Collective may be destroyed or de-identified when the personal information is no longer in use and there is no legal requirement to store the personal information. This may include if you delete our App or your Norths Collective account, or contact our Privacy Officer (see details below) in writing requesting that your personal information be deleted and such personal information is no longer necessary in order to interact with Norths Collective.

USE OR DISCLOSURE OF PERSONAL INFORMATION

Your personal information will not be used or disclosed for any purpose other than the purpose for which it was collected, or for a related purpose as permitted by the Act unless:

- You have consented (which may be express or implied) to the use or disclosure
- The information is not sensitive and is for the secondary purpose of direct marketing
- The use is required or authorised by or under the law.

From time to time, you may be able to visit our Website or otherwise deal with us anonymously. However, please be aware that, if you do not provide us with certain personal information that we require, we may not be able to provide you with the products and/or services that you seek. For example, Norths Collective will be unable to let you join as a new member or access our facilities as a temporary member unless you have provided us with the required personal information.

Norths Collective will only disclose your information to third parties on the basis that they agree to keep your information confidential (except where we are authorised or required by law to disclose the information). Norths Collective will otherwise only disclose personal information to a third party where we believe that the use and/or disclosure is necessary:

- to investigate any unlawful or undesirable activity or serious misconduct which is being or has been conducted
- to assist enforcement bodies with their activities
- to lessen or prevent threats to an individual's life, health or safety
- to assist in locating a missing person
- to establish, exercise or defend a legal or equitable claim
- for the purpose of confidential alternative dispute resolution.

You consent to us disclosing your personal information to the third parties listed above, and similar organisations who may in turn provide your information to other third parties. You can withdraw your consent at any time by informing us in writing (except where we are authorised or required by law to disclose the information).

Norths Collective may use your personal information for the purposes of marketing our products/services or to inform you of new services, promotions or events that you may be interested in. For example, from time to time, Norths Collective may conduct a voluntary survey for feedback on new products or services. Before collecting survey results, we will advise you of the purpose of the survey. You may limit the amount of personal information you provide to us by not using your Norths Collective membership card or by informing us that you no longer wish to receive any promotional material from Norths Collective.

PRIVACY POLICY

HOW YOU CAN ACCESS AND SEEK TO CORRECT PERSONAL INFORMATION

If you wish to contact us regarding your personal information or make corrections, please contact our Privacy Officer (see details below). Where Norths Collective holds information about you that you are entitled to access, we will try to provide you with a suitable means of accessing it (for example, by post or email). We will not charge any fee for simply making a request for access or correction of personal information, but we may need to charge you a fee to cover our administrative and other reasonable costs in providing this information to you. You may otherwise update or correct your personal information, including your contact details, through the App.

We may decline a request for access to your personal information if the Privacy Act prohibits it or does not require us to provide access.

HOW YOU CAN SUBMIT A PRIVACY COMPLAINT

If you wish to make a complaint about the handling of your personal information by Norths Collective, please contact our Privacy Officer using the details below. In submitting a privacy complaint, please mark the email as confidential and provide detailed information of the incident so that we can investigate it. The Privacy Officer, or another representative of Norths Collective, will investigate the complaint and will provide you with a written response within a reasonable time following the completion of the investigation.

If you believe that Norths Collective has not adequately dealt with your complaint, you may forward your complaint to the Office of the Australian Information Commissioner (**OAIC**) whose contact details are as follows:

Officer of the Australian Information Commissioner
Phone: 1300 363 992
Email: enquiries@oaic.gov.au
GPO Box 5218 Sydney NSW 2001

DISCLOSURE OF PERSONAL INFORMATION TO OVERSEAS RECIPIENTS

Where necessary, Norths Collective may disclose personal information to overseas recipients such as service providers located outside Australia that provide, among other things, customer relationship management, identification and fraud detection, cloud and data storage, IT support and/or other third-party services to us.

If personal information is disclosed overseas, we will take reasonable steps to ensure appropriate compliance with the Act and our Privacy Policy.

DATA BREACH

If a data breach or suspected data breach occurs, we will undertake a prompt investigation, which will include an assessment of whether the incident is likely to result in serious harm to any individuals. In such a situation we will comply with the requirements of the Act which may require notification to the OAIC and affected individuals. Please contact us if you have reason to believe or suspect that a data breach may have occurred, so that we can investigate and, if necessary, undertake appropriate containment, risk-mitigation and notification activities as required.

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INTERIM ARRANGEMENTS FOR COVID-19

- Norths Collective may collect health information from you regarding a COVID-19 exposure, to assist in proactively manage and address WHS risks. This may include thermal scanning. Privacy considerations will be taken into account where the government requires personal details to assist with contact tracing. It may not be necessary to release the name of the individual who has COVID-19. Personal information will only be disclosed or used if it is reasonably necessary in order to prevent or manage COVID-19 in our venues
- We will always treat your private health and personal data with high confidentiality and sensitivity . It is permissible to disclose to others who are at imminent risk of serious infection that a particular person, (who will not be identified by name), has or may have COVID-19 if those people have been in close contact with the infected person
- Only the minimal amount of information as is necessary will be collected to enable the proper discharge of our WHS duties.

PRIVACY OFFICER

Please contact our Privacy Officer at:

- Email: info@norths.com.au
- Post: 12 Abbott Street, Cammeray NSW 2062
- Phone: +61 02 9245 3000

CHANGES TO OUR PRIVACY POLICY

We encourage you to regularly review our Website for any updates to our Privacy Policy. We reserve the right to update this Privacy Policy whenever we consider appropriate, for example, to reflect changes to the law or to our business. By continuing to use our products, services, Website and App or by continuing to provide us with your personal information after these changes have been published, you confirm your acceptance of these changes.

DOCUMENT CONTROL

Policy name	Privacy Policy
Approved by	Norths Collective Board
Date approved	July 2023
Frequency of review	Annually
Last reviewed	July 2023
Next review date	July 2024