

Privacy Policy of Dapto Leagues Club Limited and related entities

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This policy sets out how Dapto Leagues Club Limited its sub-clubs and its related entities ("**Dapto Leagues**", "**we**", "**us**" or "**our**") collect, use, disclose and hold "personal information".

We own and operate several clubs, sub-clubs and other businesses under a number of different trading names and brands, including the Grange Club, the "2 Venues" events service and other related entities. We also operate websites, an application ("our app") and social media associated with these venues and services. Those businesses' operations are also covered by this policy.

We are committed to protecting the privacy of all individuals whose personal information we handle.

When we collect, use, disclose, store, access or correct your personal information, our actions will comply with the *Privacy Act 1988* (Cth) (**Privacy Act**) and the *Australian Privacy Principles* (**APPs**).

Our practices also reflect our obligations as a registered club and reporting entity under the *Registered Clubs Act 1976* (NSW), liquor and gaming laws, *Corporations Act 2001* (Cth), *Work Health and Safety Act 2011* (NSW) and Anti-Money Laundering and Counter-Terrorism Financing (**AML/CTF**) legislation.

Types of Personal Information Collected

We may collect personal information such as:

- **Identity and contact information:** your full name, residential address, email address, contact number, date of birth, signature and occupation;
- **Membership information:** your membership number, class of membership, joining date, visits, positions held by you at any of our clubs or any complaints made by you or against you in connection with those clubs;
- **Visitor information:** information related to your visits to our venues and, if you are a temporary member, a temporary image of your driver's licence or other ID, from which we extract your full name, address, date of birth and signature and the expiry date to maintain our registers;
- **Information about your use of our goods and services:** what goods or services you buy or receive from us, your participation in social, sporting or other organised activities, your membership card transactions, information connected to your use of our rewards loyalty program, your payment history and event bookings and use of our app.

- **Gaming transactions:** information connected to your use of our gaming machines, KENO and TAB (including your player activity statements, prizes and payouts), the identifying numbers of the ID (in certain circumstances) and other information we are required to collect to comply with our AML/CTF obligations (including your occupation, the source of your funds, whether you are, or are an immediate family member of, a politically exposed person (“PEP”)). We are required to conduct PEP screening for each of our customers who use our gaming services, which searches may contain your (and, if applicable, your relative’s) alias, birthplace, citizenship, type of position held (e.g. politician) and positions held and other information which may appear on a PEP search;
- **Exclusion information:** whether you have excluded yourself or been excluded by us or a third party from using our gaming machines or entering our premises and information about you related to a liquor or gaming exclusion or banning order;
- **Images of you:** a photo of you for your membership card, CCTV footage and audio of you at our venues and photos of you and others participating in activities, functions and events at our venues;
- **Health information:** information about your allergies and dietary preferences if you dine with us and if you are an employee, information we may be required to collect as your employer;
- **Incident information:** things you say or do or things said about you in connection with an incident or disciplinary proceedings at or in connection with any of our venues;
- **Financial information:** your bank account details and other financial information when you book an event or make a reservation with us or when we process a gaming machine payment to you via EFT
- **Digital interactions:** information about your use of our websites, social media pages and Wi-Fi collected by website analytics, cookies, pixels and device identifiers, including information about your personal device, IP address and social media handle;
- **Employees and volunteers:** recruitment information including information from your resume and referees, your qualifications, your immigration status, police checks, working with children checks, onboarding records, training records, health information, bank account and superannuation fund details and tax file numbers (note: certain employee records are handled in accordance with the employee records exemption in the Privacy Act).
- **AI-generated or inferred information:** information generated, inferred, summarised or analysed by AI-enabled systems about your interactions with us, where that information relates to you and you are identified or reasonably identifiable.

Anonymity and pseudonymity

If you do not give us your personal information, you may not be able to become a member of our clubs, use our services or facilities, or access our premises. In most circumstances, you will be unable to deal with us anonymously or with a pseudonym because of our obligations under the Registered Clubs Act.

How we collect personal information

We collect personal information by recording information in hardcopy and by electronic and automated means.
We collect personal information:

- **Directly from you** when you:
 - enter, visit or deal with us and any of our venues;
 - apply for, or renew, your membership with us or any of our sub-clubs;
 - purchase goods or services from us or participate in activities competitions and promotions we offer;
 - apply to participate in our rewards program,
 - fail to make a payment you are required to make to us;
 - use our gaming machines;
 - exclude yourself or are otherwise excluded, suspended, banned or removed from any part of our premises;
 - plan or attend a function, event or show at a venue we operate;
 - are suspended, banned or removed from any part of our venues;
 - receive or request sponsorship through programs such as ClubGRANTS;
 - make a complaint or are involved in, witness or are connected to an incident or disciplinary proceedings at or in connection with any of our venues;
 - make an enquiry with us and interact with our staff;
 - apply for a job with us.

Via our systems and devices including our electronic ID scanners, point of sale systems, booking software, access control systems, gaming management systems, CCTV, AI-enabled systems and automated tools and website and data analytics (when you visit a website or social media page operated by us, use our Wi-Fi or use our app).

- **From third parties** such as your parent or guardian (if you are a minor), our service providers (e.g. payment processors and ticketing providers), regulators, law enforcement, gaming partners (KENO/TAB), family members who express concerns to us about your gambling, exclusion program operators (such as BetSafe and MVSE), and industry bodies.

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

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

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

Purposes of handling personal information

We collect, hold, use and disclose personal information to perform the following activities and functions:

- consider applications and renewals of membership with us;

- identify who comes to our premises, including individuals who have been suspended, banned or excluded from our premises;
- create and maintain registers and comply with our legal, regulatory and accounting obligations, including our obligations under gaming, liquor, registered clubs governance and AML/CTF law.
- provide a safe environment for you, other members, guests and our staff;
- provide goods and services and hold events and activities at our venues;
- operate our websites, our app, our rewards program and complimentary Wi-Fi at our premises;
- improve our goods and services and the functionality of our websites and our app;
- perform gaming operations and carry out responsible gambling and harm-minimisation activities (including initiating third party exclusions);
- publish and distribute newsletters;
- carry out marketing (including direct marketing), competitions and promotions;
- offer and manage sponsorships including by supporting community sports and social events;
- conduct elections of the Board and send notices of annual general meeting and other communications to our members;
- operate our sub-clubs, including publishing contact details of committee members;
- resolve complaints, investigate incidents and conduct disciplinary proceedings at or in connection with us or any of our venues;
- carry out administrative activities and functions;
- assess a job applicant's suitability for employment or a volunteer's suitability for a role; and/or
- promote the objects of our clubs, improve our services and maintain a social record of the community.
- use AI-enabled tools to assist with administration, analytics, service improvement, security, risk management, responsible gambling and compliance, subject to appropriate privacy safeguards and human oversight where required.

Direct Marketing

Dapto Leagues may use your personal information to send you information about products and services, including information from third parties. This may include newsletters, competitions, information about events, promotions and partner offers.

You can opt-out of direct marketing at any time by contacting us (please see the "How to contact us" section below for our contact details), updating your preferences on your account or by clicking unsubscribe in our marketing emails.

Artificial Intelligence

We may use artificial intelligence, automated decision-support tools and other Artificial Intelligence (AI-enabled technologies to assist with our operations, including customer service and enquiry management,) for marketing, data analysis, administrative processes, security and risk management, responsible gambling and harm-minimisation activities, processing data, and improving our goods, services, websites, app and venue operations.

Where we use AI tools, personal information may be input into those tools, or information about an individual may be generated, inferred, summarised or analysed by those tools. We will handle that information as personal information in accordance with this policy, the Privacy Act and the APPs. Any use of AI by the Club will be reviewed by a human to verify accuracy and minimise commonly known issues such as bias and AI hallucinations in line with our AI policy. The Club will not make decisions that materially affect individuals solely by automated means without human review

We will only use or disclose personal information in connection with AI tools for the purpose for which it was collected, for a related secondary purpose that you would reasonably expect, where you have consented, or where otherwise permitted or required by law. We will take particular care before using sensitive information, including health information, in connection with AI tools.

We will not use AI to make decisions that have a legal, disciplinary, exclusionary or similarly significant effect on an individual without appropriate human review. We will also take reasonable steps to reduce risks associated with AI use, including inaccurate outputs, bias, inappropriate inferences and unauthorised disclosure of personal information.

We do not permit staff to enter personal information, and particularly sensitive information, into publicly available generative AI tools unless this has been authorised and appropriate privacy and security safeguards are in place. Where we use public-facing AI tools, such as chatbots or automated enquiry tools, we will take reasonable steps to make clear that the tool is automated or AI-enabled.

We may use third party AI-enabled service providers where reasonably necessary for our functions or activities. Where we do so, we will take reasonable steps to ensure appropriate privacy, confidentiality and security arrangements are in place.

Disclosure of Personal Information

We may need to disclose your personal information to our related entities, third party service providers, AI-enabled technology providers, our insurers, exclusion program operators, Clubs NSW, our sponsors, our loyalty program partners, our legal and financial advisers and other members of our clubs.

For example, if we become concerned that you are at risk of serious gambling related harm, or if we are approached by a member of your family who has concerns about your gambling, we will take such steps as we consider appropriate to comply with our obligations and may, without your prior knowledge or consent, initiate a Multi-Venue Exclusion application in respect of you and refer you to a gambling counselling service provider.

If you wish to make a reservation to dine at the Club via our website or app, you will be directed to a third party platform to book your table and confirm any dietary or other special requirements which you may have. The Club may retain information about your special requirements for future bookings.

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

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 will also disclose your personal information to law enforcement agencies and government bodies if we are required or authorised to do so by law, including AUSTRAC, the Department of Communities and Justice and the Australian Taxation Office.

AML/CTF Reporting Obligations

As a registered club and reporting entity, we have extensive obligations under liquor and gaming and AML/CTF law to collect information about customers who use our gaming services.

Those obligations require us to:

- Verify the identity of each customer who uses our gaming services by reference to identification documents. In certain circumstances, we may choose to verify your identity electronically, using our third party verification service provider. We will not verify your identity electronically without first providing you with a separate privacy notice and seeking your consent to do so. If you do not consent, our staff can physically verify your identity documents.
- Identify whether a customer is a PEP or immediate relative of a PEP.
- Identify the source of a customer's funds.
- Keep records of certain transactions and the customer due diligence undertaken (including certain information from the identity documents relied upon and copies of PEP search results).
- Report suspicious matters to AUSTRAC.

Health Information

We do not ordinarily collect health information from individuals. However, if you wish to dine or attend a function at one of our venues, we may collect information about any allergies or other dietary requirements you may have, which may constitute health information.

We will handle health information in accordance with our policies, the Privacy Act and the *Health Records and Information Privacy Act 2002* (NSW) and will delete all health information after you have dined with us and/or attended the relevant function.

CCTV Surveillance

All our venues are subject to video surveillance for security reasons, including to monitor the safety of members, guests and employees and to protect our assets. We may use CCTV footage to investigate incidents and in disciplinary proceedings.

Access to footage is restricted but we may disclose footage to law enforcement agencies, regulatory authorities,



our insurers and our legal representatives where required. CCTV recordings are retained for a minimum period of 30 days and are destroyed when they are no longer needed.

Overseas Disclosure

We do not ordinarily disclose personal information overseas but if you agree to information being put on our websites or social media pages, then this could be accessed by other countries.

Our membership database is stored electronically on our primary servers, which are located at the Dapto Leagues premises in New South Wales. Our physical records are also stored at our venues

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.

Where we use third party providers located overseas, or disclosure data to partners outside Australia, we will take reasonable steps to ensure that the recipient will comply with the APPs, unless we reasonably believe that the recipient is subject to laws which requires them to handle personal information in a substantially similar way to the APPs.

Our App, Websites, Wi-Fi, and Analytics

Our websites and social media pages may use cookies, tags and pixels to operate the sites, measure usage and personalise content/ads. You can manage cookies via your browser settings but some features of our websites may not function without them.

If you use our websites, Wi-Fi or our app, we may also collect information about your location and device including your IP address, MAC address and the host name of your device.

We will handle any information collected as a result of your use of our websites, Wi-Fi and app in accordance with this policy.

Our websites may also contain hyperlinks to websites operated by third parties. Any hyperlinks are provided for reference only and we are not responsible for their content or the privacy practices of those third parties.

There will also be instances when dealing with our websites where you will be redirected to a third party's website or platform.

Generally, we do not have control over these third-party providers and how they collect and handle personal information that you provide to them via their platforms. We also typically have limited access to the information they collect and hold. We do not accept any liability for the actions of any such third-party providers and strongly encourage you to read their privacy policies.

Data Quality and Security

We take reasonable steps to ensure personal information we collect, use and disclose is accurate, up-to-date and complete, and that information we hold is protected against misuse, interference, loss, and unauthorised access, modification or disclosure.

Those measures include role-based access, multi-factor authentication, encryption, firewalls, use of secure

databases, staff training, vendor due diligence and controls on the use of AI tools, including restrictions on entering personal information into unauthorised public AI tools. Your personal information is securely destroyed when it is no longer needed or becomes out of date.

Notifiable Data Breaches

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

If our security measures are compromised, we will comply with our obligations for responding to data breaches outlined in the Privacy Act.

As soon as we become aware of a data breach, we will take urgent steps to contain the breach, mitigate any risk of harm and determine who may have been affected by the breach.

We will then assess the breach and determine whether the breach is likely to result in serious harm to any person whose data was involved.

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

Following a breach, we will conduct a review of our security measures and implement any additional measures we consider necessary to enhance the security of your information.

Access to and Correction of Personal Information

You have a general right to access the personal information which we hold about you and to request correction if it is inaccurate, incomplete or out of date.

We will respond to your request within a reasonable timeframe.

To assist us to comply with your request, we may need you to verify your identity and provide us with evidence of your new details. In some cases, we may be unable to give you access to, or amend, your personal information. If so, we will provide you with written reasons.

Retention and Destruction

We retain personal information for as long as it is required for the purposes described in this policy. When it is no longer required, we take reasonable steps to destroy or de-identify personal information.

Queries and Complaints

If you have any privacy-related queries, or believe we have breached the Privacy Act or any of the APPs, 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 acknowledge receipt of your correspondence and respond to you within a reasonable timeframe. We will investigate and handle your complaint in accordance with our grievance policy.



If you feel your issue has not been resolved, you may make a privacy complaint to the Office of the Australian Information Commissioner. Please visit the Office of the Australian Information Commissioner's website at <https://www.oaic.gov.au/> for their current contact details.

How to Contact Us

You can contact the Privacy Officer by:

Phone: 4261 1333
Email: community@daptoleagues.com.au
Post: Privacy Officer
Dapto Leagues Club Limited
PO Box 15
Dapto NSW 2530

Changes to this Policy

We may update or revise this policy from time to time, to reflect operational changes or changes in our legal obligations. We will notify whenever we update this policy by publishing a notice on our website and club noticeboard.

This privacy policy was last updated on 1 September 2026.