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# Richmond Club APP Privacy Policy

At Richmond Club your privacy is important to us and we take great care to protect your personal information. We are bound by the Australian Privacy Principles (APP) under the Privacy Amendment (Enhancing Privacy Protection) Act 2012. This policy outlines the information we collect and how it is used. We may modify this Privacy Policy from time to time. Therefore, you should periodically visit this page to be sure that you have read our most current Privacy Policy.

## Information Collection

Richmond Club collects personal information so we can provide you with our services. We will only collect information about you if it is relevant to our services and/or is necessary to comply with the Liquor Act 2007, the Registered Clubs Act 1976 or any other relevant legislation.

We also take steps to ensure that the information we have is accurate, complete and up to date when we use it.

## Use of Your Personal Information

Your personal information, including information about you obtained as a result of you placing your membership card in gaming or other club machine (not ATM's), may be used by the Club for marketing purposes to improve our services and to provide you with the latest information about those services, any new related services and promotions.

The Club may also use your personal information for the purpose of collection and analysis of data reasonably required for the preparation of reports to the Independent Liquor and Gaming Authority; for service development and planning and for management reporting. Reports for external bodies will be aggregated data and will not identify a member or visitor to the Club.

We use your personal information:

- to provide you with our services;
- to facilitate any transaction you may wish to carry out and to create a better, more personalised on-line experience for you
- to identify, and inform you of, services that may be of interest to you;
- to administer our customer relationship with you

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- for internal purposes such as procedural assessment, risk management, service reviews and improvement, website and advertisement improvement, staff training, accounting and billing
  - to improve our products and services so we can provide you with increased service and standards
  - to comply with provisions and regulations of the Registered Clubs Act, the Corporations Law, the AML/CTF Act and other legislation;
  - to forward information in respect of the activities of the club including regulatory reports and notices to members;
  - to record, keep and update members loyalty bonus points;
  - to record, keep and update player accounts. Members that use their membership card to accrue points can request a Player Activity Statement be issued to them.

When you give personal information to us, we may ask if you want to receive future communication from us, (such as newsletters, emails or other information). You can choose to opt out of receiving information via email or by informing us in writing.

## **Securing your personal information**

Depending on the circumstances, we may hold your information in either hard copy, electronic form or both.

We hold all personal information securely to ensure that it is protected from unauthorised access, modification or disclosure. Our staff members follow strict information handling procedures and we only permit staff to access your information if their duties require it. We delete your personal information once it is no longer needed or required to be kept by law by shredding hard copy records and demagnetising electronic records.

## **Disclosure of information**

Richmond Club will only disclose your personal information for a purpose that is related to the services that we provide to you. This may include disclosures to:

- individuals/organisations that provide us with professional advice such as lawyers, accountants and business advisers;
- contractors, to whom we outsource certain functions, such as mailing houses, electronic network administrators and debt collection agencies.

The Richmond Club uses Australian contractors, individuals and organisations to handle its services to date. Disclosure of personal information to overseas contractors, individuals, or organisations is unlikely.

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The Club may also disclose personal information to relevant authorities if it reasonably believes there is a threat to an individual life, health or safety or public health or safety. If the Club has reason to suspect that unlawful activity has been, is being or may be engaged in, personal information may be used or disclosed as a necessary part of any investigation and reporting to relevant persons or authorities.

## **Accessing your personal information**

Individuals have the right to request what personal information is being held by the Richmond Club. The Richmond Club encourages its members to ensure that all information kept by us is up to date and accurate. A refusal of access may occur in the event that the information contradicts an Australian law court/tribunal order or it can be reasonably justified that giving this information to an individual may cause a threat to life, health or safety or public health or safety. Information can be requested in person from relevant Richmond Club staff or management. Appropriate identification may be requested before any information is released.

## **Breach Handling**

Richmond Club takes all due care when handling any information collected. However, in the event that Richmond Club ascertains a breach of privacy has occurred it will notify the affected party within a reasonable time frame to reach the best resolution for the individual. If you believe that a breach of your privacy has occurred and you have been unable to resolve the matter directly with the Richmond Club, you may report the matter to the Office of the Australian Information Commissioner. More information on the OAIC can be found at <http://www.oaic.gov.au>.

## **Our Contact Details**

Richmond Club welcomes your questions and comments about our handling of your personal details and this Privacy Policy.

Richmond Club Marketing  
PO Box 13  
Richmond NSW 2753      PH: (02) 4578 1144

*This Privacy Policy is effective as of March, 2014.*