PRIVACY POLICY

Effective Date: July 2025 (updated to reflect legislative amendments and regulatory standards)

Policy Statement
Ballina Bowling & Recreation Club Ltd Privacy Policy ensures honesty and integrity in meeting its obligations of the Privacy Act 1988 and the Privacy Amendment (Enhancing Privacy Protection) Act 2012. The policy applies to all employees of Ballina Bowling & Recreation Club Ltd. This policy came into effect as of July 2021.

Purpose
Clubs with an annual turnover of $3 million or more, or with obligations under the Anti-Money Laundering and Counter Terrorism Financing Act 2006, have obligations under the Privacy Act to uphold the Australian Privacy Principles (APPs). To ensure Ballina Bowling & Recreation Club Ltd meets its compliance responsibilities the aim of this policy is to ensure we abide by our legal guidelines in a consistent manner.

The policy must cover the following information:

- The kinds of personal information the Club collects
- How the Club collects and stores that information
- The purposes for which the Club collects, holds, uses and discloses that information
- How a person may access and ask for correction of their personal information
- How a Club will deal with complaints

Rationale
Ballina Bowling & Recreation Club Ltd recognises that the personal information of members and guests is private and should only be used for the purpose it was collected. Although the APPs provide for the ability of people to act anonymously or use pseudonyms, obligations to identify members, temporary members and guests as per the Registered Clubs Act 1976 overrides this ability, as we are obliged to ensure we collect the identity of patrons as they enter the premises.

Scope
The Policy applies to all Ballina Bowling & Recreation Club Ltd properties including buildings, vehicles and outdoor areas within Ballina Bowling & Recreation Club Ltd boundaries.

Privacy Policy of the Ballina Bowling & Recreation Club Ltd:

Ballina Bowling & Recreation Club Ltd (the "Club") is committed to providing you with the highest levels of customer service. This includes protecting your privacy and keeping you informed of our privacy policy.

Privacy Policy
Ballina Bowling & Recreation Club Ltd (the "Club") is registered under the Registered Clubs Act 1976. The Club is required to comply with the provisions of the Privacy Act 1988 and the Privacy Amendment (Enhancing Privacy Protection) Act 2012 which regulates, among other things, the collection, storage, quality, use and disclosure of personal information.

The principal activities of the Club are:

- providing a venue for members and guests to engage in social activities
- supporting the community in sporting events
- providing members and their families access to a range of goods and services
- providing a safe friendly environment for locals to meet

Collection: The Club collects personal information from members including name, address, occupation, date of birth, proof of age, contact details and the extent of your use of, and purchase of, goods and services offered by, or available at or from, the Club. Also, if you access the Club website, the information we collect includes your IP address, type of operating system, type of browser you operate and the area generally where you are located when accessing the website.

The Club collects this information from you by various means including without limitation by you completing your membership application or renewal form, by you entering the Club as a temporary member or guest of a member via our electronic sign in system, by you completing entries into competitions and promotions and automatically when you access the website.

Your personal information is held securely in our computer system and where your personal information has been provided in hard copy format this information is either destroyed, held securely on a Club site, held securely within the control of our Sub-Club representatives or held securely in off-site storage.

The Club collects this information to:

- identify you and process your membership applications
- meet statutory requirements under the Registered Clubs Act, Anti – Money Laundering and Counter Terrorism laws and other relevant legislation
- contact members to advertise and market events, activities, opportunities, offers and the goods and services provided by the Club or companies in which the Club has

an ownership interest (including by direct mail, telephone, SMS and MMS) including without limitation with respect to food and beverage, promotions, entertainment, wagering, gaming machines, gaming, sporting events and venue hire.
- analyse usage of food and services offered by the club,
- provide you with goods or services you are receiving or utilising as offered by the Club and to offer and administer any benefits you subsequently become entitled to in relation to that product or service,
- share your information with companies in which the Club has an ownership or interest for the purpose of them marketing their products to you,
- analyse website usage.

Use

The Club will only use your personal information for the purpose for which you have provided it, e.g. for application of club membership or to gain entry to the Club premises as a visitor or guest or for other uses as permitted by the Privacy Act or uses for which you have consented to having your personal information used for.

When or before the Club collects personal information, the Club will take reasonable steps to inform the individual providing the information of:

- the purposes for which the information is collected,
- where applicable, any law that requires the information to be collected.
- the main consequences for the user if all or part of the information is not provided.

The Club will be unable to allow you to join the Club or to be a temporary member, unless you have provided us with the required personal information. The Club will also be unable to provide you with certain goods and services or to join a Sub-Club, unless you have first provided the Club with the required personal information.

The Club will not use your personal information for any other purpose, nor will we disclose it, unless we have your consent or in other circumstances where such use or disclosure is permitted under the Privacy Act.

The Club may disclose your information to third parties that provide services under contract to the Club. These contracts require the third party to keep your personal information confidential and secure.

From time to time, the Club may wish to carry out a voluntary survey for feedback. Before collecting survey results, the Club will advise you of the purpose of the survey e.g. to gain information for the club to improve services etc.

Visitors and Guests
Under the Registered Clubs Act patrons visiting the Club must produce a recognised form of identification i.e. passport, driver's license or proof of age card to gain entry to the premises. The Club uses terminals to gather this information and to protect the data collected i.e. addresses of patrons. Scanning of licenses is optional, and if preferred, use of manual sign-in, via the terminals is available for patrons once the form of identification has been sighted by an authorised officer of the Club.

Surveillance of Venues
The venue of the Club is subject to video surveillance for security reasons. Details of suspected or actual illegal and/or undesirable activities on our premises may be shared with other clubs, law enforcement and regulatory bodies such as the Office of Liquor, Gaming and Racing and the Independent Liquor and Gaming Authority.

Personal Information Storage
Personal information is stored and archived for a period of seven (7) years. This includes information about non-members and internet site transmission logs.
The Club relies on the information provided by members to be accurate and current. The Club will take reasonable steps to ensure that the personal information it collects, uses or discloses is accurate, complete and up to date.

If you believe the personal information we hold on you is incorrect, please advise us in writing, sending your letter or email to the Privacy Officer using the details below. We will take reasonable steps to correct Club records appropriately and within a reasonable time frame except where the Privacy Act prohibits it or does not require it.

Access The Privacy Act allows individuals to access and alter records containing their personal information. If you wish to access the personal information the Club holds on you, please provide a written request to the General Manager using the details below. The Club will provide you access to your information except where the Privacy Act prohibits it or does not require it.

To change your name on the membership database supporting documentation from a government source is required. Change of addresses can be done by request at reception.

Complaints: If you wish to make a complaint about the Club's use of your personal information please put your complaint in writing, providing as much detail as possible, and forward it by letter or email to the General Manager using the details below. The General Manager, or another representative of the Club, will investigate the complaint and will provide you with a written response following the completion of the investigation.

Cross Border Disclosure

The Club does not transmit personal information across border. The Club does not transfer personal data overseas. All third-party vendors engaged by the Club are contractually bound to store and process personal information within Australia in compliance with the Privacy Act 1988.

Latest Amendments to the Privacy Act

In 2025, the Privacy Act has been updated to include stricter regulations on data collection, storage, and usage. Organizations are required to obtain explicit consent from individuals before collecting their personal data. Additionally, the Act mandates regular audits to ensure compliance with privacy standards.

Digital Privacy Considerations

With the increasing use of digital platforms, it is essential to address digital privacy concerns. Our policy now includes detailed information on the use of cookies, tracking technologies, and data analytics. We ensure that users are informed about the types of data collected and the purposes for which it is used.

Modern Data Breach Notification Requirements

In the event of a data breach, organizations are required to notify affected individuals within 72 hours. Our policy outlines the steps to be taken in case of a data breach, including immediate investigation, assessment of the impact, and communication with the affected parties. We are committed to transparency and accountability.

The Club will conduct regular internal audits to ensure compliance with the Privacy Act and ClubsNSW privacy management framework. Audit results will guide ongoing improvements to data protection practices.

The Club will obtain your express consent prior to collecting personal information, including when using digital tools or third-party service providers. Consent may be provided through digital checkboxes, membership forms, or in-person acknowledgements.

Members may opt out of marketing communications at any time by contacting the Club or updating their preferences at reception or via our website.

When you visit our website, we may collect information using cookies, tracking pixels, and other technologies. This may include your IP address, browser type, time of access, pages visited, and referring sites. This data is used for analytics and service improvement. You may choose to disable cookies via your browser settings.

In the event of a data breach likely to result in serious harm, the Club will notify affected individuals and the Office of the Australian Information Commissioner (OAIC) within 72 hours, in accordance with the Notifiable Data Breaches (NDB) scheme.

Privacy Officer
Further information on Privacy can be obtained by contacting the Club's General Manager:
General Manager
Ballina Bowling & Recreation Club
68 Cherry Street
PO Box 548
BALLINA NSW 2478
p: Telephone: 02 6686 2811
email: gm@cherrystreet.com.au