Privacy Policy

Category:	**Governance and Compliance Policy**
Summary	**How Finley RSC collects, uses, stores and discloses personal information, and how to access, correct or complain about it**
Officer Responsible	**Privacy Officer, HR Business & Risk Manager**
Title & Date Approved	**October 2026**
Version Number	**Version 3 (replaces June 2025 and September 2020 versions)**
Review Date	**October 2027, or sooner if the law changes**
Relevant Legislation	**Privacy Act 1988 (Cth), including the Australian Privacy Principles and the Notifiable Data Breaches scheme** **Privacy and Other Legislation Amendment Act 2024 (Cth)** **Spam Act 2003 (Cth) and Do Not Call Register Act 2006 (Cth)** **Registered Clubs Act 1976 (NSW)** **Liquor Act 2007 (NSW) and Gaming Machines Act 2001 (NSW)** **Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)** **Workplace Surveillance Act 2005 (NSW)**
Related Documents	**CCTV Policy, Complaints and Grievance Resolution Policy, Whistleblower Policy, Website Terms of Use**

1. About This Policy

Finley Returned Soldiers Club Ltd (ABN 92 001 050 246) (Finley RSC, the Club, we, us, our) respects your privacy. We are bound by the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs).

This policy explains what personal information we collect, why we collect it, how we hold and protect it, who we may share it with, and how you can access or correct it or make a complaint. It applies to members, guests, visitors, customers, job applicants, contractors, suppliers and users of our website and social media.

Personal information is information or an opinion about an identified person, or a person who is reasonably identifiable. This policy does not cover records about current and former employees that relate directly to their employment, which are managed under our internal HR policies.

2. Personal Information We Collect

Depending on how you deal with us, we may collect:

- **Identity and contact details:** your name, address, date of birth, phone number and email address.

- **Membership records:** membership number, membership category, photograph, application and renewal details, and the details we must record under the Registered Clubs Act 1976 (NSW).
- **Guest and visitor records:** sign-in details for guests and temporary members, as required by law.
- **Identification:** details from identification documents you show us, for example to confirm your age or identity, or where we are required to check identification under liquor, gaming or anti-money laundering laws.
- **Gaming and responsible gambling records:** prize payment and transaction records, and self-exclusion and responsible gambling records.
- **Bookings and transactions:** function, event and bistro booking details, and payment details. Card payments are processed by our payment providers and we do not store full card numbers.
- **CCTV footage:** images of people on or around Club premises, recorded by our security cameras. Our cameras do not record audio.
- **Incident, complaint and feedback records:** details of incidents, injuries, complaints and feedback, which may include witness details.
- **Marketing and promotions:** details you give us when you enter competitions, promotions, raffles or surveys, or subscribe to our newsletters.
- **Job applications:** your resume, references and other information you provide when applying for a role.
- **Website information:** technical information collected through cookies and analytics tools when you visit our website (see Section 9).

Sensitive information

Some information is sensitive information under the Privacy Act, such as health information (for example in an incident report or an accessibility request), or information about your service with the Australian Defence Force where it is relevant to RSL Sub-Branch activities. We only collect sensitive information with your consent, or where the law requires or allows it.

3. How We Collect Personal Information

We collect personal information directly from you wherever possible, including:

- in person at the Club, for example when you join, renew, sign in, make a booking, claim a prize or report an incident,
- through membership application forms, booking forms, competition entries and surveys,
- by phone, email, post, our website and our social media pages, and
- through our CCTV system, which operates in public areas of the Club and car park, with signs displayed at entrances.

Sometimes we collect information from other people, for example a member who signs you in as a guest, a referee you nominate, NSW Police or a regulator, or a gambling self-exclusion provider. Where we collect information from someone else, we will take reasonable steps to let you know, unless it is obvious or the law says otherwise.

Dealing with us anonymously

Where it is lawful and practical, you may deal with us without identifying yourself or by using a pseudonym, for example when making a general enquiry or giving feedback. This is not possible for membership, guest sign-in, prize payments over legal thresholds, or other activities where the law requires us to identify you.

4. Why We Collect and Use Personal Information

We collect, hold and use personal information to:

- process membership applications and renewals and maintain the register of members,
- meet our obligations under registered clubs, liquor, gaming, responsible gambling, anti-money laundering, work health and safety and tax laws,
- manage bookings, functions, events, promotions and competitions,
- keep members, guests, staff and visitors safe and protect Club property, including through CCTV,
- respond to enquiries, feedback, complaints and incidents,
- assess job applications,
- send you information about Club events, offers and member news, where you have agreed or the law allows (see Section 7),
- improve our services, venue and website, and
- administer the Club, including dealing with insurers, auditors and professional advisers.

If you do not provide the information we ask for, we may not be able to provide the service you want, for example admitting you as a member or guest, or accepting a booking.

5. Who We May Disclose Personal Information To

We may disclose personal information to:

- service providers who help us run the Club, such as IT, website, membership system, point of sale, email marketing, payment processing, security and CCTV providers, who may only use it to provide services to us,
- our auditors, insurers, lawyers and other professional advisers,
- NSW Police, Liquor & Gaming NSW, AUSTRAC and other government bodies or regulators where required or permitted by law,
- gambling self-exclusion and responsible gambling providers where you have joined a self-exclusion scheme, and
- anyone else you have authorised, or where the law requires or allows it.

We do not sell, rent or trade your personal information.

Disclosure overseas

Some of our service providers store data on servers outside Australia. In particular, our website is hosted by Wix, which stores data in the United States, and some email and cloud software providers

may store data in the United States or other countries. Where we use overseas providers, we take reasonable steps to ensure they handle personal information in a way consistent with the APPs.

6. How We Hold and Protect Personal Information

We hold personal information in paper and electronic records, including secure cloud based systems. We take reasonable steps to protect it from misuse, interference, loss, and unauthorised access, change or disclosure, including:

- limiting access to staff and providers who need it for their role,
- using passwords, user access levels and secure systems,
- keeping CCTV recorders and paper records in secure areas,
- training staff in their privacy and confidentiality obligations, and
- strict rules prohibiting staff from copying, photographing or sharing CCTV footage (see our CCTV Policy).

How long we keep information

We keep personal information only for as long as we need it, or as long as the law requires. For example, CCTV footage is generally kept for at least 30 days and then overwritten, unless it is needed for an incident, investigation or legal matter, and membership, gaming and financial records are kept for the periods required by law. When information is no longer needed, we destroy it securely or de-identify it.

Data breaches

If a data breach is likely to result in serious harm to the people involved, we will notify those people and the Office of the Australian Information Commissioner (OAIC), as required by the Notifiable Data Breaches scheme.

7. Direct Marketing

With your consent, or where the law allows, we may send you information about Club events, promotions, offers and member news by email, SMS or post. Every marketing email and SMS will include a simple way to unsubscribe. You can also opt out at any time by contacting us using the details in Section 12.

We will not send gambling related marketing where it is prohibited by law, or to anyone who has joined a gambling self-exclusion scheme. We do not give your details to other organisations for their own marketing.

8. Automated Decision Making

The Club does not use computer programs to make decisions about you, without human involvement, that could significantly affect your rights or interests. If this changes, we will update this policy to explain the kinds of decisions made and the personal information used, as required by the Privacy Act from 10 December 2026.

9. Our Website, Cookies and Social Media

Our website uses cookies and analytics tools to make the site work and to understand how visitors use it, for example the pages viewed and how visitors found the site. This information generally does not identify you. You can set your browser to refuse cookies, although some parts of the website may not work properly.

Our website may contain links to other websites, including social media sites such as Facebook and Instagram. We are not responsible for the privacy practices of those sites, and we encourage you to read their privacy policies. Information you post publicly on our social media pages may be seen by others.

10. Accessing and Correcting Your Personal Information

You can ask to access the personal information we hold about you, or ask us to correct it if it is inaccurate, out of date, incomplete or misleading. Please contact the Privacy Officer using the details in Section 12.

We will need to confirm your identity before releasing or changing any information. We will respond within 30 days. Access is free, although we may charge a reasonable fee to cover the cost of providing large amounts of information, and we will tell you before any fee is charged. If we refuse access or correction, we will explain why in writing, unless that would be unreasonable, and tell you how to complain.

Requests to view CCTV footage are handled under our CCTV Policy, and footage of other people may need to be blurred or withheld to protect their privacy.

11. Making a Privacy Complaint

If you believe we have breached the Privacy Act or this policy, please contact the Privacy Officer in writing using the details in Section 12, and tell us what happened and how you would like it resolved.

- We will acknowledge your complaint within 5 business days.
- We will investigate and aim to give you a written response within 30 days. If we need longer, we will let you know why and when to expect a response.
- Your complaint will be handled confidentially, and you will not be treated unfairly for making it.

If you are not satisfied with our response, you can complain to the Office of the Australian Information Commissioner (OAIC):

- Website: www.oaic.gov.au
- Phone: 1300 363 992
- Post: GPO Box 5288, Sydney NSW 2001

12. Contact Us

For any privacy question, request or complaint, please contact:

Privacy Officer

Finley Returned Soldiers Club Ltd

63-67 Tocumwal Street, Finley NSW 2713

PO Box 117, Finley NSW 2713

Phone: 03 5883 1366

Email: admin@finleyrsc.com.au (please mark your email "Attention: Privacy Officer")

13. Changes to This Policy

We may update this policy from time to time to reflect changes in the law, our operations or technology. The current version will always be available on our website, www.finleyrsc.com.au, and a copy can be requested free of charge from the Club.

This policy is effective from October 2026.