



## Privacy Policy

### Capalaba Sports Club

Liquor Licence No. 83515

Effective date: 12 March 2014 (as amended)

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### 1. About this Privacy Policy

Capalaba Sports Club (“the Club”, “we”, “us”, “our”) operates as a licensed club and gaming venue in Queensland. We are required to collect and handle personal information to comply with the *Privacy Act 1988 (Cth)*, the Australian Privacy Principles (APPs), and Queensland liquor and gaming laws, including regulatory requirements administered by the Office of Liquor and Gaming Regulation (OLGR).

This Privacy Policy explains how we collect, use, disclose and protect personal and sensitive information relating to members, visitors, patrons, staff, contractors and suppliers.

By visiting the Club, applying for membership, attending events, using our website, or dealing with us in any way, you acknowledge that you have read and understood this Privacy Policy.

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### 2. What is Personal Information?

**Personal information** means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in a material form or not.

Examples include your name, date of birth, address, contact details, identification documents, payment details, photographs, and opinions that identify you.

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### 3. Sensitive Information

#### 3.1 What is Sensitive Information?

Sensitive information is a subset of personal information and includes information or opinions about:

- racial or ethnic origin;
  - religious or philosophical beliefs;
  - political opinions or memberships;
  - trade union or professional association membership;
  - sexual orientation or practices;
  - criminal record;
  - health information;
  - genetic or biometric information (including biometric templates).
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### 3.2 Collection of Sensitive Information

As a licensed club and gaming venue, we may collect limited sensitive information where required or permitted by law, including to:

- verify identity and age for entry, gaming or alcohol service;
- maintain excluded persons, self-exclusion or barring registers;
- comply with responsible gambling and harm minimisation obligations;
- manage incidents, safety and security on our premises;
- meet regulatory, audit and reporting obligations.

We only collect sensitive information:

- where it is reasonably necessary for our functions or activities; and
- with your consent, unless an exception under the *Privacy Act* applies or collection is required or authorised by law.

Sensitive information is not used for direct marketing without express consent.

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## 4. Collection of Personal Information

### 4.1 What We Collect

Depending on your interaction with the Club, we may collect:

- full name, address, phone number and email address;
  - date of birth and proof of age or identity (e.g. driver licence, passport);
  - membership and visitation details, including details required under member and visitor registers;
  - gaming-related information, including self-exclusion or exclusion status;
  - CCTV footage and photographs taken on or around Club premises;
  - incident and security reports;
  - emergency contact details;
  - health or medical information relevant to safety or emergencies;
  - payment and transaction details;
  - feedback, complaints or survey responses;
  - employment-related information (where applicable).
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## 5. How We Collect Personal Information

We collect personal information:

- directly from you (e.g. membership applications, ID checks, registers);
  - when you enter or use our licensed or gaming areas;
  - through CCTV and security systems;
  - when you participate in gaming, promotions or events;
  - through our website, online forms or digital services;
  - from third parties where permitted by law (e.g. regulatory bodies or other clubs).
  - Where required, we will notify you of the collection and its purpose.
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## 6. Cookies and Online Activity

Our website may use cookies to improve functionality and analyse traffic. Cookies do not usually identify you personally. You may disable cookies through your browser settings.

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## 7. Purpose of Collection, Use and Disclosure

We collect, use and disclose personal information to:

- verify identity and age as required under Queensland liquor and gaming laws;
- administer club membership and visitor access;
- operate gaming facilities and comply with responsible gambling obligations;
- maintain excluded persons and barring registers;
- ensure safety, security and good order on the premises;
- investigate and manage incidents, complaints or breaches of venue rules;
- facilitate medical assistance or emergency response;
- manage Club governance, operations and compliance;
- provide products, services, promotions and events;
- communicate with patrons, members and regulators;
- comply with legal, regulatory and audit requirements;
- improve our facilities, services and patron experience.

We will not use or disclose personal information for a purpose other than the primary purpose of collection unless:

- you have consented;
  - you would reasonably expect the use or disclosure;
  - it is required or authorised by law; or
  - it is necessary to prevent a serious threat to health, safety or public welfare.
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## 8. Disclosure to Third Parties

We may disclose personal information to:

- the Office of Liquor and Gaming Regulation (OLGR);
- Queensland Police Service or other law enforcement agencies;
- Clubs Queensland, Clubs Australia and affiliated member clubs;
- other licensed venues for reciprocal arrangements or exclusion enforcement;
- professional advisers and service providers (e.g. security, IT, auditors);
- insurers and incident investigators.

Disclosures occur only where necessary for Club operations, legal compliance or as permitted by law.

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## 9. Direct Marketing

We may send you information about Club events, promotions, membership benefits and services.

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You may opt out of marketing communications at any time by:

- using the unsubscribe option in electronic messages; or
- contacting us directly.

Sensitive information is never used for marketing without express consent.

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## **10. Cross-Border Disclosure**

Some personal information may be stored or processed outside Australia (including New Zealand or the United Kingdom) through IT, gaming or data hosting providers.

Where this occurs, we take reasonable steps to ensure overseas recipients handle personal information in a manner consistent with Australian privacy standards, unless you have consented otherwise.

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## **11. CCTV Surveillance and Photography**

### **11.1 CCTV Surveillance**

CCTV operates throughout the Club and surrounding areas to:

- comply with liquor and gaming licensing conditions;
- ensure patron and staff safety;
- deter and investigate incidents.

#### **CCTV footage:**

- is generally retained for at least 28 days;
- may be retained longer where an incident occurs or upon lawful request;
- may be disclosed to OLGR, police or other authorities where required.

CCTV systems at this venue may use facial recognition technology to identify self-excluded or banned patrons for safety and regulatory compliance.

### **11.2 Photography**

Photographs or video recordings may be taken at Club premises or events. Unless you advise us otherwise, you consent to their use for Club promotional and marketing purposes without compensation.

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## **12. Data Quality and Security**

We take reasonable steps to:

- ensure personal information is accurate, complete and up to date;
  - protect information from misuse, loss, unauthorised access or disclosure;
  - securely destroy or de-identify information when no longer required.
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You are encouraged to notify us of any changes or inaccuracies in your information.

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### **13. Access and Correction**

You may request access to, or correction of, personal information we hold about you, subject to legal exceptions (including gaming and regulatory secrecy provisions).

Requests can be made using the contact details below. We will respond within a reasonable timeframe.

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### **14. Consent and Policy Updates**

By entering the Club, applying for membership, participating in gaming or using our services, you consent to the handling of your personal information in accordance with this Privacy Policy.

We may update this policy from time to time. The current version will be available at the Club or on request.

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### **15. Privacy Complaints**

If you have a concern or complaint about how we handle your personal information, please contact us:

**Telephone:** 07 3390 3011

**Email:** gm@capalabasportsclub.com.au

**Post:** PO Box 1087

*Attention: Club Manager*

We will:

- liaise with you to identify and define the nature and cause of the complaint
- acknowledge your complaint;
- investigate and respond within a reasonable timeframe; and
- keep a record of the complaint and outcome.

If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner (OAIC).