

# Redcape Group Ltd

## Corporate Policy

Privacy Policy

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Redcape Group Ltd and its related corporations (**Redcape**) is committed to complying with all privacy laws and principles, including the principles contained in the Privacy Act 1988 (Cth) as in force from time to time, and to protecting personal and sensitive information from unfair and unauthorised use. Management and oversight of Redcape is outsourced to a third party manager who is an agent of Redcape and who is bound to apply and abide by the Redcape Group Ltd Privacy Policy. We are also committed to ensuring that our employees and those of the third party manager, are aware of their obligations in relation to the protection of personal and sensitive information.

This policy describes:

- who we collect information from;
- the types of personal information collected and held by us;
- how this information is collected and held;
- websites, devices and cookies;
- social media;
- the purposes for which your personal information is collected, held, used and disclosed;
- how you can gain access to your personal information and seek its correction;
- how we store your personal information;
- when we disclose your personal information
- how you may complain or inquire about our collection, handling, use or disclosure of your personal information and how that complaint or inquiry will be handled;
- whether we are likely to disclose your personal information to any overseas recipients;
- how to gain access to and update or correct your personal information;
- sensitive information;
- complaints;
- contacting us; and
- how this policy may change.

### **Who do we collect personal information from?**

In the course of providing our products and services Redcape may collect personal information from customers, or potential customers and staff. This may be by way of individuals completing a form within our venues, registering for our loyalty program, making an enquiry or booking, filling in a field on a website or posting on social media.

### **What types of personal information do we collect?**

In the course of providing products and services we may collect personal information, which includes any information, preferences or opinion(s) about an identified or identifiable individual (even if this information does not identify a person by name – examples include place of work, business activities and employment details), whether or not the information or opinion is true or not and whether or not the information or opinion is recorded in a material form or not. Personal information includes names, addresses and other contact details, dates of birth and financial information, including your use of a membership card for purchases of goods and services at Redcape's venues.

Our venues are also required to have CCTV surveillance for the safety and security of staff and patrons. Images are retained in accordance with licence conditions.

### **How do we collect and hold your personal information?**

If it is reasonable and practical to do so, we collect personal information directly from you. We collect that information through various means including, but not limited to: phone, email, mail, application forms, CCTV networks, web sites, over the counter, information systems, membership cards and face to face meetings.

We may also collect personal information from other people (e.g. a third party promotions operator) or independent sources, however, we will only do so where it is not reasonable and practical to collect the information from you directly.

Sometimes we may be provided with your personal information without having sought it through our normal means of collection. We refer to this as “unsolicited information”. Where we collect unsolicited information we will only hold, use and or disclose that information if we could otherwise do so had we collected it by normal means. If that unsolicited information could not have been collected by normal means then we will destroy or de-identify the information as appropriate provided it is lawful to do so.

Personal information that we collect is held in different formats, including in hard copy and electronically.

### **Web sites, devices and cookies**

We will collect information that has been inputted into forms and field on our website including your identity when this has been provided to us. Redcape may also use cookies. The use of cookies means that when you visit our website we may also collect information about your visits to, browsing of, and use of the website, unless your web browser has been set to blocks this. The range of information that we may collect will depend on how you interact with our website.

This information may include:

- your IP address (a unique identifier allocated to your computer for your connection to the internet);
- your computer device details (PC, tablet, smartphone, watch etc.);
- the make and version of web browser you are using;
- your operating system;
- your browser plug-ins;
- any web-page you came from, identified as the referrer web page address by your web browser;
- cookies;
- page response times;
- download error;
- pages and parts of pages you visit;
- usage you make of our website, including enquiries and searches undertaken, and registrations for accounts, forums etc.;
- services and products you viewed;

- length of visit to website and pages; and
- page interaction information (such as scrolling, keys pressed, mouse clicks, touches, and mouse-overs).

While this data will normally be used anonymously and aggregated for analysis, data collected from use of our websites may be linked to your identity, when this has been provided.

If our websites contain links to other websites, we do not share your personal information with those websites and we are not responsible for their privacy practices. Please check their privacy policies.

### **Social Media**

Redcape may wish to collect data that has been posted on publically available social media websites, channels or forums. This will include social media account user details, feedback, comments and photos which relates to Redcape and our venues. This information may be used by Redcape for promotions and advertising.

### **The purposes for which your personal information is collected**

The general purposes for which we collect and hold your personal information are to identify you, along with providing you with function and activity information, as well as products, services, promotions and advertising to improve our products and services for your enjoyment.

### **How we use your personal information?**

We only use personal information that is reasonably necessary for one or more of our functions or activities (the primary purpose) or for a related secondary purpose that would be reasonably expected by you, or to which you have consented.

Our uses of personal information include but are not limited to:

- providing you with direct marketing information on offers, activities, events, promotions, products and services;
- to conduct reviews and analysis of offers, activities, events, promotions and services;
- satisfy our legal obligations including those under the laws relating to liquor, gaming or Anti-money laundering(AML)/Counter Terrorism Financing (CTF); and
- helping us to improve our operations, including training our staff, systems development, development of new programs and services, undertaking planning and research and statistical analysis.

It may be necessary to disclose your information to Redcape's third party manager, who manages and oversees Redcape. The third party manager operates under a management agreement and its use and disclosure of personal information is covered and governed by the Redcape Group Ltd Privacy Policy.

It may also be necessary for Redcape or Redcape's third party manager to disclose your personal information to other third parties in order to assist us with one or more of our functions or activities. This may include organisations providing:

- marketing and promotional services;

- help to improve our day to day operations including training our staff; systems development; developing new programs and services; undertaking planning, research and statistical analysis;
- business administration such as for payroll or insurance purposes;
- employment sourcing, screening and licensing;
- checking ID for responsible gaming, AML/CTF or licensing purposes; and
- law enforcement bodies, regulators and insurers.

### **Storage and security of your personal information**

We store personal information in a variety of formats including on databases, in hard copy files and on personal devices, including laptop computers.

The security of your personal information is of paramount importance to us and we take all reasonable steps to protect the personal information we hold about you from misuse, loss, unauthorised access, modification or disclosure.

Personal information we hold that is no longer needed, or required to be retained by any other laws, is destroyed in a secure manner, deleted or de-identified as appropriate.

### **When we disclose your personal information**

We only use personal information for the purposes for which it was given to us, or for purposes which are directly related to one or more of our functions or activities. We may disclose your personal information to government agencies from time to time, only if one or more of the following apply:

- you have consented;
- you would reasonably expect us to use or disclose your personal information in this way;
- we are authorised or required to do so by law;
- disclosure will lessen or prevent a serious threat to the life, health or safety of an individual or to public safety;
- where another permitted general situation applies; or
- disclosure is reasonably necessary for a law enforcement related activity.

### **Disclosure of your personal information to overseas recipients**

We may disclose personal information about an individual to overseas organisations that help us provide our services and manage our business systems (e.g. marketing & advertising agencies, market research analysts, IT consultants and providers).

### **How to gain access to and update or correct your personal information**

We take all reasonable steps to ensure the personal information we hold, use and disclose is accurate, complete and up-to-date. These steps include ensuring that the personal information is accurate, complete and up-to-date at the time of collection and on an ongoing basis we maintain and update personal information when we are advised by the individual. Please contact us if any of the details you have provided change. You should also contact us if you believe that the information we have about you is not accurate, complete or up-to-date.

You may request access to the personal information we hold about you by contacting us.

If we do not agree to provide you with access or to amend your personal information as requested you will be notified accordingly. Where appropriate we will provide you with the reason/s for our decision. If the rejection relates to a request to change your personal information you may make a statement about the requested change and we will attach this to your record.

### **Sensitive Information**

Sensitive information includes a person's race or ethnic origin, political opinions, religious beliefs, membership of a trade or professional association, sexual preferences, health records, government identifiers (such as your TFN), your nationality, country of birth, family court orders and criminal records.

It is not our normal practice for us to collect sensitive information and we would only collect sensitive information if we have the consent of the individuals to whom the sensitive information relates, or if the collection is necessary to lessen or prevent a serious threat to life, health or safety or another permitted general situation.

### **Anonymity and Using a Pseudonym**

You have the option of dealing with us anonymously or by using a pseudonym if it is lawful and practical to do so. In some cases however, we will generally require your contact details if you would like us to transact with you, or if you would like us to respond to your request to provide you with some product, service or information that you are seeking.

### **Privacy Complaints**

If you wish to make a complaint about a breach by us of the Australian Privacy Principles, you may do so by providing your written complaint by email, letter, and facsimile or by personal delivery to any one of our contact details as noted below.

We will respond to your complaint within a reasonable time (usually no longer than 30 days) and we may seek further information from you in order to provide a full and complete response.

### **How to Contact Us**

You can contact us about this Privacy Policy or about your personal information by:

- Emailing: [privacy@redcape.com.au](mailto:privacy@redcape.com.au)
- Calling: (02) 9719 4000
- Writing: 'Privacy Officer', PO Box 115, Drummoyne, NSW 2047 or by facsimile at (02) 9719 4099

If practical, you can contact us anonymously (i.e. without identifying yourself) or by using a pseudonym. However, if you choose not to identify yourself, we may not be able to give you the information or provide the assistance you might otherwise receive if it is not practical to do so.

### **Changes to our privacy and information handling practices**

This Privacy Policy is subject to change at any time. Please check our Privacy Policy on our website (<http://www.redcape.com.au/>) regularly for any changes.