



## Privacy Policy of Societie Group and related entities

**Issue Date: 17<sup>th</sup> April 2026**

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This policy sets out how Ramsgate RSL Memorial Club Ltd trading as Societie Group, its sub-clubs and its related entities (“**Societie Group**”, “**we**”, “**us**” or “**our**”) collect, use, disclose and hold “personal information”.

We own and operate several clubs, sub-clubs and other businesses under a number of different trading names and brands, including The Arbour Heathcote, Fingal Bay Sports Club and Club Engadine. Those businesses’ operations are also covered by this policy.

We are committed to protecting the privacy of all individuals whose personal information we handle.

When we collect, use, disclose, store, access or correct your personal information, our actions will comply with the *Privacy Act 1988* (Cth) (**Privacy Act**) and the *Australian Privacy Principles* (**APPs**).

Our practices also reflect our obligations as a registered club and reporting entity under the *Registered Clubs Act 1976* (NSW), liquor and gaming laws, *Corporations Act 2001* (Cth), *Work Health and Safety Act 2011* (NSW) and Anti-Money Laundering and Counter-Terrorism Financing (**AML/CTF**) legislation.

### Types of Personal Information Collected

We may collect personal information such as:

- **Identity and contact information:** your full name, residential address, email address, contact number, date of birth, signature and occupation;
- **Membership information:** your membership number, class of membership, joining date, visits, positions held by you at any of our clubs or any complaints made by you or against you in connection with those clubs;
- **Visitor information:** information related to your visits to our venues and, if you are a temporary member, a temporary image of your driver’s licence or other ID, from which we extract your full name, address, date of birth and signature and the expiry date to maintain our registers;
- **Information about your use of our goods and services:** what goods or services you buy or receive from us, your participation in social, sporting or other organised activities, your membership card transactions, information connected to your use of our rewards loyalty program, points you convert to money via your GSL eftpos card, data relating to your use of the Play City app, your payment history and event bookings;
- **Gaming transactions:** information connected to your use of our gaming machines, KENO and TAB (including your player activity statements, prizes and payouts), the identifying numbers of the ID (in certain circumstances) and other information we are required to collect to comply with our AML/CTF obligations (including your occupation, the source of your funds, whether

you are, or are an immediate family member of, a politically exposed person (“**PEP**”). We are required to conduct PEP screening for each of our customers who use our gaming services, which searches may contain your (and, if applicable, your relative’s) alias, birthplace, citizenship, type of position held (e.g. politician) and positions held and other information which may appear on a PEP search;

- **Exclusion information:** whether you have excluded yourself or been excluded by us or a third party from using our gaming machines or entering our premises and information about you related to a liquor or gaming exclusion or banning order;
- **Images of you:** a photo of you for your membership card, CCTV footage and audio of you at our venues and photos of you and others participating in activities, functions and events at our venues;
- **Facial recognition data:** biometric information and templates derived from images or video of you and any metadata associated with our use of facial recognition technology;
- **Health information:** information about your allergies and dietary preferences if you dine with us and if you are an employee, information we may be required to collect as your employer;
- **Incident information:** things you say or do or things said about you in connection with an incident or disciplinary proceedings at or in connection with any of our venues;
- **Financial information:** your bank account details and other financial information when you book an event or make a reservation with us, when we process a gaming machine payment to you via EFT or when you apply for a prepaid eftpos card and/or link your bank account to our rewards program to convert bonus points to money;
- **Digital interactions:** information about your use of our websites, social media pages and Wi-Fi collected by website analytics, cookies, pixels and device identifiers, including information about your personal device, IP address and social media handle;
- **Employees and volunteers:** recruitment information including information from your resume and referees, your qualifications, your immigration status, police checks, working with children checks, onboarding records, training records, health information, bank account and superannuation fund details and tax file numbers (note: certain employee records are handled in accordance with the employee records exemption in the Privacy Act).

### **Anonymity and pseudonymity**

If you do not give us your personal information, you may not be able to become a member of our clubs, use our services or facilities, or access our premises. In most circumstances, you will be unable to deal with us anonymously or with a pseudonym because of our obligations under the Registered Clubs Act.

### **How we collect personal information**

We collect personal information by recording information in hardcopy and by electronic and automated means. We collect personal information:

- **Directly from you** when you:
  - enter, visit or deal with us and any of our venues;

- apply for, or renew, your membership with us or any of our sub-clubs;
  - purchase goods or services from us or participate in activities competitions and promotions we offer;
  - apply to participate in our rewards program, including applying for a prepaid GSL eftpos card;
  - use your membership card or convert your bonus points to your GSL eftpos card;
  - fail to make a payment you are required to make to us;
  - use our gaming machines;
  - exclude yourself or are otherwise excluded, suspended, banned or removed from any part of our premises;
  - plan or attend a function, event or show at a venue we operate;
  - are suspended, banned or removed from any part of our venues;
  - receive or request sponsorship through programs such as ClubGRANTS;
  - make a complaint or are involved in, witness or are connected to an incident or disciplinary proceedings at or in connection with any of our venues;
  - make an enquiry with us and interact with our staff;
  - apply for a job with us.
- **Via our systems and devices** including our electronic ID scanners, point of sale systems, booking software, access control systems, gaming management systems, CCTV and facial recognition system and website and data analytics (when you visit a website or social media page operated by us, use our Wi-Fi or the Play City app).
  - **From third parties** such as your parent or guardian (if you are a minor), our service providers (e.g. payment processors and ticketing providers), regulators, law enforcement, gaming partners (KENO/TAB), family members who express concerns to us about your gambling, exclusion program operators (such as BetSafe), and industry bodies.

In general, if you contact us, we may keep a record of that correspondence.

Wherever practicable, we will notify you of the information being collected about you and provide you with an opportunity to refuse the collection of your information.

If you give us personal information about others, we expect that you will tell them about this policy.

### **Purposes of handling personal information**

We collect, hold, use and disclose personal information to perform the following activities and functions:

- consider applications and renewals of membership with us;
- identify who comes to our premises, including individuals who have been suspended, banned or excluded from our premises;
- create and maintain registers and comply with our legal, regulatory and accounting obligations, including our obligations under gaming, liquor, registered clubs governance and AML/CTF law.
- provide a safe environment for you, other members, guests and our staff;
- provide goods and services and hold events and activities at our venues;

- operate our rewards program, including offering members the GSL eftpos card which allows members to convert bonus points to money with a third party financial services provider;
- operate our websites and provide the Play City app and complimentary Wi-Fi at our premises;
- improve our goods and services and the functionality of our websites and Play City app;
- perform gaming operations and carry out responsible gambling and harm-minimisation activities (including initiating third party exclusions);
- publish and distribute newsletters;
- carry out marketing (including direct marketing), competitions and promotions;
- offer and manage sponsorships including by supporting community sports and social events;
- conduct elections of the Board and send notices of annual general meeting and other communications to our members;
- operate our sub-clubs, including publishing contact details of committee members;
- resolve complaints, investigate incidents and conduct disciplinary proceedings at or in connection with us or any of our venues;
- carry out administrative activities and functions;
- assess a job applicant's suitability for employment or a volunteer's suitability for a role; and/or
- promote the objects of our clubs, improve our services and maintain a social record of the community.

### **Direct Marketing**

Societie Group may use your personal information to send you information about products and services, including information from third parties. This may include newsletters, competitions, information about events, promotions and partner offers.

You can opt-out of direct marketing at any time by contacting us (please see the "How to contact us" section below for our contact details), updating your preferences on your account or by clicking unsubscribe in our marketing emails.

### **Disclosure of Personal Information**

We may need to disclose your personal information to our related entities, third party service providers, our insurers, exclusion program operators, Clubs NSW, our sponsors, our loyalty program partners, our legal and financial advisers and other members of our clubs.

For example, if we become concerned that you are at risk of serious gambling related harm, or if we are approached by a member of your family who has concerns about your gambling, we will take such steps as we consider appropriate to comply with our obligations and may, without your prior knowledge or consent, initiate a Multi-Venue Exclusion application in respect of you and refer you to a gambling counselling service provider.

Your personal information will only be disclosed to third parties for a purpose permitted by the Privacy Act and/or this policy and, where required, after obtaining your consent.

We will also disclose your personal information to law enforcement agencies and government bodies if we are required or authorised to do so by law, including AUSTRAC, the Department of Communities and Justice and the Australian Taxation Office.

### **AML/CTF Reporting Obligations**

As a registered club and reporting entity, we have extensive obligations under liquor and gaming and AML/CTF law to collect information about customers who use our gaming services.

Those obligations require us to:

- Verify the identity of each customer who uses our gaming services by reference to identification documents. In certain circumstances, we may choose to verify your identity electronically, using our third party verification service provider. We will not verify your identity electronically without first providing you with a separate privacy notice and seeking your consent to do so. If you do not consent, our staff can physically verify your identity documents.
- Identify whether a customer is a PEP or immediate relative of a PEP.
- Identify the source of a customer's funds.
- Keep records of certain transactions and the customer due diligence undertaken (including certain information from the identity documents relied upon and copies of PEP search results).
- Report suspicious matters to AUSTRAC.

### **Health Information**

We do not ordinarily collect health information from individuals. However, if you wish to dine or attend a function at one of our venues, we may collect information about any allergies or other dietary requirements you may have, which may constitute health information.

We will handle health information in accordance with our policies, the Privacy Act and the *Health Records and Information Privacy Act 2002* (NSW) and will delete all health information after you have dined with us and/or attended the relevant function.

### **CCTV Surveillance**

All our venues are subject to video surveillance for security reasons, including to monitor the safety of members, guests and employees and to protect our assets. We may use CCTV footage to investigate incidents and in disciplinary proceedings.

Access to footage is restricted but we may disclose footage to law enforcement agencies, regulatory authorities, our insurers and our legal representatives where required. CCTV recordings are retained for a minimum period of 30 days and are destroyed when they are no longer needed.

## Facial Recognition

We use facial recognition technology at our venues to enhance our security procedures and assist us to identify and remove persons who have been suspended, banned or excluded from our venues. We do not use facial recognition for any other purposes (such as marketing or profiling).

If you enter our venues, designated security cameras will capture an image of your face, analyse your biometric information from that image and create a “face print”. A “face print” is a mathematical representation of your biometric information, which is used to uniquely identify you.

This “face print” will then be compared against a database of individuals who have been suspended, banned or excluded from our venues.

If your “face print” matches the “face print” of an individual on our database, our staff will be alerted. Steps will then be taken to manually verify your identity and, if necessary, to remove you from the venue.

If your “face print” does not match the “face print” of an individual who has been suspended, banned or excluded from our premises, your “faceprint” will be deleted within 60 minutes.

For the purposes of enabling the “faceprint” matching referred to above, if an individual has been suspended, banned or excluded from our premises, we will collect a copy of that individual’s “faceprint” from an image of that individual (e.g. from CCTV or the photo on the individual’s membership card) and store it in a separate secure database. That database can only be accessed by authorised staff.

We will delete an individual’s image and “face print” from our database once their suspension, ban or exclusion comes to an end.

We will not store your “face print” unless you have been suspended, banned or excluded from any of our premises.

## GSL Eftpos Card

Under our rewards program, members can earn points with us and convert those points into money via a prepaid GSL eftpos card or to pay a BPAY bill by using their My Card Place account.

If you apply to participate in our rewards program, you will enter into a separate contract with Cuscal Limited and not with us. We have no control over, and are not responsible for, your dealings with Cuscal Ltd and their authorised representative, Next Payments.

Our involvement is limited to providing your completed application (or cancellation) form to Next Payments and providing them with information concerning your points (including balances and the dates they were earned). We otherwise have no control over or knowledge concerning your eftpos card, linked bank accounts and any payments you make using the any points you have converted.

We will provide you with a copy of the relevant terms and condition for the rewards program when you make your application. We strongly encourage you to read Cuscal and Next Payment’s privacy policies to understand how they will collect, hold and use your personal information <https://www.ramsgatersl.com.au/gsl-eftpos-card/>

## **Overseas Disclosure**

We do not ordinarily disclose personal information overseas but if you agree to information being put on our websites or social media pages, then this could be accessed by other countries.

Our membership database is stored electronically on our primary servers, which are located at Ramsgate RSL Memorial Club's premises in New South Wales. Our physical records are also stored at our venues

We also occasionally use software and secure cloud servers, which may also involve the use of servers that may be located in other countries and may also constitute a disclosure under the Privacy Act.

Where we use third party providers located overseas, or disclosure data to partners outside Australia, we will take reasonable steps to ensure that the recipient will comply with the APPs, unless we reasonably believe that the recipient is subject to laws which requires them to handle personal information in a substantially similar way to the APPs.

## **Websites, Wi-Fi, Play City App and Analytics**

Our websites and social media pages may use cookies, tags and pixels to operate the sites, measure usage and personalise content/ads. You can manage cookies via your browser settings but some features of our websites may not function without them.

If you use our websites, Wi-Fi or Play City app, we may also collect information about your location and device including your IP address, MAC address and the host name of your device.

We will handle any information collected as a result of your use of our websites, Wi-Fi and app in accordance with this policy.

Our websites may also contain hyperlinks to websites operated by third parties. Any hyperlinks are provided for reference only and we are not responsible for their content or the privacy practices of those third parties.

There will also be instances when dealing with our websites where you will be redirected to a third party's website or platform. For example, you will be redirected to a third-party payment platform to make an online payment to us. Similarly, the Play City app is owned and operated by a third party, CLUBS 4 FUN Pty Ltd. Whilst we have some access to the information they collect.

Generally, we do not have control over these third-party providers and how they collect and handle personal information that you provide to them via their platforms. We also typically have limited access to the information they collect and hold. We do not accept any liability for the actions of any such third-party providers and strongly encourage you to read their privacy policies.

## **Data Quality and Security**

We take reasonable steps to ensure personal information we collect, use and disclose is accurate, up-to-date and complete, and that information we hold is protected against misuse, interference, loss, and unauthorised access, modification or disclosure.

Those measures include role-based access, multi-factor authentication, encryption, firewalls, use of secure databases, staff training and vendor due diligence. Your personal information is securely destroyed when it is no longer needed or becomes out of date.

All data collected by our use of facial recognition technology is stored on our local servers at Ramsgate RSL Memorial Club. We do not store any information collected by our facial recognition technology with a third party or on the cloud.

### **Notifiable Data Breaches**

Societie Group has various security measures in place to protect your personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure.

If our security measures are compromised, we will comply with its obligations for responding to data breaches outlined in the Privacy Act.

As soon as we become aware of a data breach, we will take urgent steps to contain the breach, mitigate any risk of harm and determine who may have been affected by the breach.

We will then assess the breach and determine whether the breach is likely to result in serious harm to any person whose data was involved.

If we have reasonable grounds to believe that the breach is likely to result in serious harm to you, we will notify you of the breach as soon as possible. We will also notify the Office of the Australian Information Commissioner.

Following a breach, we will conduct a review of our security measures and implement any additional measures we consider necessary to enhance the security of your information.

### **Access to and Correction of Personal Information**

You have a general right to access the personal information which we hold about you and to request correction if it is inaccurate, incomplete or out of date.

We will respond to your request within a reasonable timeframe.

To assist us to comply with your request, we may need you to verify your identity and provide us with evidence of your new details. In some cases, we may be unable to give you access to, or amend, your personal information. If so, we will provide you with written reasons.

### **Retention and Destruction**

We retain personal information for as long as it is required for the purposes described in this policy. When it is no longer required, we take reasonable steps to destroy or de-identify personal information.

### **Queries and Complaints**

If you have any privacy-related queries, or believe we have breached the Privacy Act or any of the APPs, please contact our Chief Executive Officer (**CEO**).

When contacting our CEO, please give us enough details to be able to identify you, understand your issue or complaint and respond appropriately.

We will acknowledge receipt of your correspondence and respond to you within a reasonable timeframe. We will investigate and handle your complaint in accordance with our grievance policy.

If you feel your issue has not been resolved, you may make a privacy complaint to the Office of the Australian Information Commissioner.

Please visit the Office of the Australian Information Commissioner's website at <https://www.oaic.gov.au/> for their current contact details.

### **How to Contact Us**

You can contact the CEO by:

Phone: (02) 9504 8000

Email: [privacy@societiegroupp.com.au](mailto:privacy@societiegroupp.com.au)

Post: Chief Executive Officer  
Societie Group  
PO Box 126  
Ramsgate NSW 2217

### **Changes to this Policy**

We may update or revise this policy from time to time, to reflect operational changes or changes in our legal obligations. We will notify whenever we update this policy by publishing a notice on our website and club noticeboards.

This privacy policy was last updated on 17<sup>th</sup> April 2026.