

## PRIVACY POLICY

Norths Collective is committed to protecting our patrons' privacy through compliance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles.

Norths Collective covers the whole group and includes The Alcott, Seagulls, Norths Cammeray and The Greens.

The Privacy Act 1988 (Cth) regulates how organisations such as Norths Collective manages patrons' personal information. The Act also includes the Australian Privacy Principles which direct how information should be collected, used, managed and secured. The 2017 Amendment to the Privacy Act has also introduced the Notifiable Data Breach Scheme, which outlines responsibilities such as monitoring, responding, assessing, and reporting relevant information breaches. We will also undertake reasonable steps to ensure compliance with the General Data Protection Regulation (GDPR) where applicable.

### PURPOSE

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Norths Collective's Privacy Policy provides an overview of what and why we collect, store and use the personal information that we receive or create about our patrons.

### SECURITY OF PERSONAL INFORMATION

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At Norths Collective we regard privacy of information seriously and will take reasonable precautions to ensure the security of our patrons' personal information from misuse, interference, loss and unauthorised access, modification or disclosure; and how it is collected, kept secure, used and disclosed. This will include:

- Maintaining governance standards and security measures that prevent data breaches
- Ongoing monitoring of any potential breaches
- Containing any data breaches that may occur
- Assessing any potential serious harm that any breach may have on our patrons
- Taking remedial action to minimise any harm
- Notifying patrons of the data breach in the event that there is the likelihood for serious harm
- Reviewing the data breach incident including investigating the cause of the breach, developing prevention plans and adapting any findings to improve Norths Collective processes and procedures.

## PRIVACY POLICY

### WHY WE COLLECT AND HOLD PERSONAL INFORMATION

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We may collect and hold your personal information to:

- Identify you and verify your identity
- Manage and control the quality of our services to you
- Market our services to you
- Undertake research and analysis related to our services in order to improve them
- Maintain security at our venues by collecting information from your driver's licence when you enter our venues or collecting your car number plate details when you park in the car park of one of our venues
- Assist you with enquiries or complaints
- Forward information relating to activities of Norths Collective including regulatory reports and notices to members
- Record, keep and update our members' loyalty bonus points
- Record, keep and update our player accounts
- Comply with our legal and regulatory obligations, for example, we may be legally required to collect personal information under the Registered Clubs Act, Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) Act 2006 (Cth), the Corporations Act 2001 (Cth) and other legislation.

Norths Collective may collect personal information from minors and will respectfully limit the collection of such personal information to what is reasonably necessary to attend Tabatinga facilities or to participate in a Club event. Reasonable additional steps will be taken with regard to collecting personal information from minors. These include:

- Types of personal information collected from minors
- Limiting our collection of personal information from minors to no more than is reasonably necessary
- Restricted uses of the personal information
- Access to parents to correct or remove personal information relating to the minor.

## PRIVACY POLICY

### PERSONAL INFORMATION WE MAY COLLECT AND HOLD

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The kinds of personal information that Norths Collective may collect and hold about you depends on the nature of your dealings with us and the requirements of applicable laws, regulations, licence conditions and betting rules:

- Name
- Your gender
- Email address
- Date of birth
- Occupation
- Home phone
- Mobile telephone number
- Residential address (street name, number, suburb, state and postcode)
- Postal address
- Identification documentation including driver's licence, passport, NSW photo card
- Information for security purposes such as footage from CCTV surveillance and car registration details
- Health information required for participation at fitness facilities
- Members activity information including gaming data and purchase history
- Information required for employment purposes
- Information required for event booking deposits, payments and booking including credit card or bank account details
- Personal information required for referrals of club membership, fitness centres and events
- Information required for marketing purposes.

### HOW WE COLLECT AND HOLD PERSONAL INFORMATION

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Norths Collective will collect personal information through membership registration and as patrons access our facilities and services. This personal information is held on our software systems which are secure.

### HOW LONG DO WE KEEP YOUR PERSONAL INFORMATION?

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Personal information collected and held by Norths Collective will be destroyed or de-identified when the personal information is no longer in use and there is no legal requirement to store the personal information.

## PRIVACY POLICY

### USE OR DISCLOSURE OF PERSONAL INFORMATION

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Personal information will not be used or disclosed for any purpose other than our primary purpose unless:

- The individual has consented to the use or disclosure
- The information is not sensitive and is for the secondary purpose of direct marketing
- The use is required or authorised by or under the law.

### HOW YOU CAN ACCESS AND SEEK TO CORRECT PERSONAL INFORMATION

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If you wish to contact us regarding your personal information or make corrections, please email our team at: [info@norths.com.au](mailto:info@norths.com.au)

### HOW YOU CAN SUBMIT A PRIVACY COMPLAINT

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If you wish to submit a privacy complaint, please email our CEO at: [luke.simmons@norths.com.au](mailto:luke.simmons@norths.com.au)

### DISCLOSURE OF PERSONAL INFORMATION TO OVERSEAS RECIPIENTS

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Where necessary, Norths Collective may disclose personal information to overseas recipients such as service providers located outside Australia that provide, among other things, customer relationship management, identification and fraud detection, cloud and data storage, IT support and/or other third-party services to us.

If personal information is disclosed overseas, we will take reasonable steps to ensure appropriate compliance with privacy requirements.

## PRIVACY POLICY

### INTERIM ARRANGEMENTS FOR COVID-19

- Norths Collective may collect health information from patrons regarding a COVID-19 exposure, to assist in proactively manage and address WHS risks. This may include thermal scanning. Privacy considerations will be taken into account where the government requires personal details to assist with contact tracing. It may not be necessary to release the name of the individual who has COVID-19. Personal information will only be disclosed or used if it is reasonably necessary in order to prevent or manage COVID-19 in our venues
- We will always treat your private health and personal data with high confidentiality and sensitivity. It is permissible to disclose to others who are at imminent risk of serious infection that a particular person, (who will not be identified by name), has or may have COVID-19 if those people have been in close contact with the infected person
- Only the minimal amount of information as is necessary will be collected to enable the proper discharge of our WHS duties.

### DOCUMENT CONTROL

<b>Policy name</b>	Privacy Policy
<b>Approved by</b>	Norths Collective Board
<b>Date approved</b>	June 2020
<b>Frequency of review</b>	Annually
<b>Last reviewed</b>	June 2020
<b>Next review date</b>	June 2021