

PRIVACY POLICY

1. Purpose

This Privacy Policy applies to personal information collected by Keppel Bay Sailing Club (the Club). The Club is an applicable organisation under the *Privacy Act 1988 (Cth)* (the Privacy Act), which governs how private sector organisations collect, use, secure, and disclose personal information. The Privacy Act incorporates the Australian Privacy Principles (APPs), which set out standards, rights, and obligations for handling personal information.

The APPs cover areas such as:

- Collection of personal information (including what can be collected and how).
- Use and disclosure of personal information.
- Data quality and security to ensure information is accurate and protected.
- Access and correction rights for individuals.
- Transparency through privacy policies and notices; and
- Complaint handling processes for privacy concerns.

This Privacy Policy outlines:

- How and when the Club collects personal information.
- How the Club uses and discloses personal information.
- How the Club keeps personal information secure, accurate, and up-to-date.
- How an individual can access and correct their personal information; and
- How the Club will facilitate or resolve a privacy complaint.

We recommend that you read and understand this Privacy Policy and keep it for future reference. If you require clarification, please contact the Club using the details provided at the end of this document.

2. Scope

This Privacy Policy applies to the Club's collection, use and disclosure of personal information from any source, including the Clubs employees and other individuals engaged by, or providing services to the Club.

In relation to employees of the Club, this Privacy Policy will apply only to the extent that the collection, use or disclosure of that personal information does not fall within the definition of an exempt practice pursuant to section 7B(3) of the *Privacy Act*.

3. Personal Information

3.1. What is Personal Information?

Personal information has the meaning given in the *Privacy Act 1988 (Cth)* and means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether recorded in a material form or not.

Examples of personal information include an individual's name, contact details, date of birth, identification documents, photographs, video footage, and opinions that can reasonably identify a person.

3.2. Collection of Personal Information

The Club collects only personal information that is reasonably necessary for its operations as a licensed club. This may include:

- identity and contact details.
- proof of age and identity as required by law.
- membership and visitor register information.
- exclusion or banning information required under gaming and liquor laws.
- CCTV footage and photographs.
- payment and billing information where applicable.

Where possible, personal information is collected directly from individuals through interactions with employees, forms, or Club services. If information is obtained from third parties (e.g., regulators or law enforcement), the Club will take reasonable steps to notify the individual of the collection and its purpose, unless doing so is impracticable or unlawful.

The Club's website may use cookies to improve functionality and user experience. Cookies store preferences and help the site operate efficiently but generally do not identify individuals. The Club does not use cookies to collect sensitive information or track individuals for marketing without consent. Users can disable cookies via browser settings, though this may affect site performance.

Please refer to **Appendix A – Privacy Collection Notice**.

3.3. Use and Disclosure of Personal Information

Personal information is collected, held and disclosed by KBSC only for purposes permitted under the *Privacy Act*, including:

- compliance with liquor and gaming legislation.
- identity and age verification.
- administration of membership and visitor requirements.
- maintenance of venue safety, security, and good order.
- management of self-exclusion and banned persons registers.
- responding to incidents, emergencies, or regulatory requests.
- operation and improvement of Club services.

Personal information may be disclosed without further consent where required or authorised by law, including disclosures to:

- Queensland Police Service.
- Office of Liquor and Gaming Regulation (OLGR).
- other regulators or statutory bodies.

3.4. Disclosure to Other Organisations

The Club may disclose personal information to third parties where necessary to support lawful and legitimate operations. This may include:

- Industry associations and governing bodies for membership administration, industry reporting, compliance and regulatory obligations.
- Professional advisers and service providers such as legal, accounting, IT, and security consultants engaged to assist the Club in fulfilling its obligations.
- Contractors and vendors who provide operational support, including technology maintenance and venue services.

All disclosures are limited to information that is reasonably necessary for the intended purpose. Before sharing personal information, the Club will take reasonable steps to ensure that recipients handle the data in accordance with this policy and applicable privacy laws. This includes requiring third parties to implement appropriate security measures and comply with any contractual obligations regarding confidentiality and data protection.

4. Sensitive Information

4.1. What is Sensitive Information?

Sensitive information is a subset of personal information and includes information or opinions about an individual and may include:

- racial or ethnic origin.
- political opinions or affiliations.
- religious or philosophical beliefs.
- membership of a professional or trade association or trade union.
- sexual orientation or practices.
- criminal record.
- health or medical information.
- genetic information; and
- biometric information, including biometric templates used for facial recognition.

4.2. Collection of Sensitive Information

The Club seeks to minimise the collection of sensitive information. Sensitive information will only be collected where it is:

- reasonably necessary for the Club's functions or activities; and
- required or authorised by law, including under the *Liquor Act 1992 (Qld)* or *Gaming Machine Act 1991 (Qld)*; or
- collected with the individual's express consent, unless an exception under the *Privacy Act* applies.

Sensitive information will not be used for direct marketing purposes.

4.3. Consent

Where consent is required, the Club will obtain consent at or around the time the sensitive information is collected.

Sensitive information collected by the Club may include:

- criminal history relevant to venue bans or exclusions.
- health or dietary requirements where voluntarily disclosed.
- biometric information solely for identifying excluded or banned persons.
- gambling-related information required for self-exclusion or harm-minimisation obligations.

5. CCTV, Photography and Facial Recognition Technology

5.1. CCTV

CCTV operates at all entry points and throughout all KBSC premises to support security, safety, and compliance with regulatory requirements. Cameras are positioned to monitor high-traffic and sensitive areas while respecting privacy obligations.

5.1.1. Retention of Footage

All CCTV footage is retained for a minimum of 28 days in accordance with regulatory standards. Where footage relates to an incident, such as a security breach, unlawful activity, or regulatory investigation, it must be securely archived for at least 12 months or longer if required by law or ongoing proceedings.

5.1.2. Access and Disclosure

CCTV footage must be provided or preserved upon request by authorised bodies, including the Office of Liquor and Gaming Regulation (OLGR) or Queensland Police Service. Access to footage is strictly limited to authorised KBSC personnel and law enforcement, and all handling must comply with privacy and security protocols.

Footage must be stored securely using appropriate technical safeguards to prevent unauthorised access, alteration, or disclosure. Access logs should be maintained to record all instances of retrieval or sharing of CCTV data.

5.2. Photography

The Club may take photographs and video recordings at events or on its premises for promotional, marketing, and archival purposes. These images may be used in publications, social media, advertising, and other materials that promote the Club's activities and services.

Where practicable, the Club will inform patrons that photography may occur during events. Individuals who do not wish to be photographed or recorded may opt out by notifying Club employees prior to or during the event. Reasonable steps will be taken to respect such requests, including avoiding or removing identifiable images where possible.

Photographs and recordings will be handled in accordance with the Club's Privacy Policy and relevant privacy legislation. Images will not be used for purposes unrelated to Club operations without consent.

5.3. Facial Recognition Technology (FRT)

The Club utilises Facial Recognition Technology (FRT) solely to meet obligations under Queensland gaming and liquor legislation. FRT is strictly limited to identifying individuals subject to exclusion or banning orders to prevent entry to licensed premises or designated gaming machine areas and to support safe management of the venue.

Biometric information collected through FRT is not permitted to be used for marketing, loyalty or rewards, behavioural profiling, analytics, or for encouraging gambling or liquor consumption.

5.3.1. Retention

FRT is used only to detect excluded or banned individuals. Facial templates and other biometric data that do not match an exclusion/banning record will be deleted immediately by system design.

Biometric records (e.g., facial templates) associated with a confirmed match may be retained only for as long as is reasonably necessary to enforce an active exclusion or banning order.

When an order expires or is revoked, associated biometric records must be securely deleted without undue delay (and, in any case, within the Club's documented deletion window). This minimisation principle is required under the *Privacy Act 1988 (Cth)* and APPs, which mandate that personal information be kept no longer than necessary for the lawful purpose.

The Club must not retain or disclose any personal information held in the FRT system after the licence ends.

5.3.2. Access Controls

Access to biometric data is restricted to authorised personnel who have completed privacy and compliance training. All access is logged and subject to regular audits to ensure accountability and compliance with the APPs Technical safeguards, including encryption and secure storage, are implemented to protect biometric data against misuse, interference, or unauthorised access.

5.3.3. Signage

The Club displays clear signage at each entrance, at gaming area entrances, and near ID scanners (where used) stating that FRT is in operation, its sole purpose (identifying excluded/banned persons), and how patrons can access the Club's Privacy Policy for more information.

6. Direct Marketing

By providing your personal information, including your email address, you consent to the Club using it to send you information about products, services, events, and other activities we believe may interest you. This may include third-party offerings.

Where reasonably expected based on your interactions with the Club, we may also use your information for direct marketing. You consent to the Club sharing your information with affiliated organisations for this purpose.

You can opt out at any time by using the "unsubscribe" link in our emails or by contacting the Club using the details provided in this document. Upon request, we will also stop sharing your information with other organisations for marketing.

7. Cross Border Disclosure

The Club aims to store personal information in Australia wherever possible. However, some data may be transferred or stored overseas when using international hosting services or third-party providers that support Club operations.

By submitting your personal information, you consent to its possible disclosure, transfer, storage, and processing outside Australia. You acknowledge that privacy protections in other countries may differ from Australian law, but the Club will take reasonable steps to ensure your information is handled securely and in accordance with this Privacy Policy.

Under the Privacy Act, the Club must take reasonable steps to ensure overseas recipients comply with APPs unless you consent otherwise. If you do not consent to overseas transfers, please contact the Club using the details provided at the end of this document.

8. Data Quality and Security

The Club takes reasonable steps to protect your personal information. However, please note that no data transmission over the internet can be guaranteed as completely secure.

Notwithstanding the above, the Club will take reasonable steps to:

- make sure that the personal information collected, used or disclosed is accurate, complete and up to date.
- protect your personal information from misuse, loss, unauthorised access, modification or disclosure both physically and through computer security methods; and
- destroy or permanently de-identify personal information if it is no longer needed for its purpose of collection.

However, the accuracy of personal information depends largely on the information you provide to the Club, so we recommend that you:

- let the Club know if there are any errors in your personal information; and
- keep the Club up-to-date with changes to your personal information (such as your name or address).

9. Access to and correction of your personal information

You are entitled to have access to any personal information relating to you which the Club possesses, except in some exceptional circumstances provided by law (e.g. secrecy provisions under the Anti Money Laundering and Counter Terrorism Financing laws). You are also entitled to edit and correct such information if the information is inaccurate, out of date, incomplete, irrelevant or misleading.

If you would like access to or correct any records of personal information the Club has about you, you are able to access and update that information (subject to the above) by contacting us via the details set out at the end of this document.

10. Consent

By visiting the Club, using its website, or accepting any terms and conditions that reference this document, you agree to the terms outlined in this Privacy Policy.

The Club may update this document from time to time to reflect changes in business requirements. You will be notified of any updates either through direct communication or by a notice posted on the website. Continued use of our products, services, website, or ongoing engagement with the Club after such notification will be considered your acceptance of the revised policy.

If you do not agree with the Club's continued use of your personal information under the updated policy, please contact us using the details provided at the end of this document.

11. Resolving Privacy Complaints

The Club has procedures to resolve privacy complaints promptly and fairly, ensuring decisions are made quickly without compromising quality. If you have concerns about how the Club collects, uses, discloses, or stores your personal information, please contact:

Attention: The Company Secretary
Telephone: 07 4939 5000
Email: Secretary@kbsc.com.au
Post: PO Box 32, Yeppoon Qld 4703

In order to resolve a complaint, the Club:

- will liaise with you to identify and define the nature and cause of the complaint.
- may request that you provide the details of the complaint in writing.
- will keep you informed of the likely time within which we will respond to your complaint; and
- will inform you of the legislative basis (if any) of our decision in resolving such complaint

The Club will keep a record of the complaint and any action taken in a privacy register.

12. Data Breach Response Plan

The Club will take the security of personal information seriously. In the event of a data breach, our Club follows a Data Breach Response Plan to ensure that any incident is managed promptly and appropriately.

If the Club suspects that a data breach has occurred, it will:

- investigate the circumstances and assess the risk of harm.
- take immediate steps to contain the breach and prevent further unauthorised access.
- notify affected individuals where there is a likelihood of serious harm.
- notify the Office of the Australian Information Commissioner (OAIC), where required under the Notifiable Data Breaches (NDB) scheme; and
- review the incident to strengthen our systems and practices.

If you believe your personal information may have been compromised, please contact the Club immediately using the details provided in this Policy.

13. Review of this Policy

This policy will be reviewed every 2 years or as required upon a change of legislation or major privacy breach.

14. Document Information

Version Control				
Version	Author	Approver	Date	Changes
1.0	Executive Admin	Board of Directors	Oct 2022	Initial Issue
1.1	Executive Admin	Reviewed by Management Team	Dec 2025	Updated policy to align to Clubs Qld issued template and APPs. Included FRT information.
2.0	Executive Admin	Board	Feb 2026	Added Privacy Collection Notice

APPENDIX A

PRIVACY COLLECTION NOTICE

Keppel Bay Sailing Club is committed to managing your personal information in accordance with the Information Privacy Act 2009 (Qld) and the Australian Privacy Principles, as applicable.

We collect the personal information you provide on this form to manage the main service or activity described. We may also use your information for related purposes, such as contacting you about club events, activities, services, volunteer opportunities, or important administrative updates.

If you do not provide the requested information, we may not be able to provide you with the service or activity requested.

We may disclose your personal information to:

- our committee members, staff and volunteers where necessary to carry out club functions.
- service providers engaged by the club (for example, IT, payment or event management providers).
- insurers and professional advisers.
- governing or peak sporting bodies or regulatory authorities where required or authorised by law.

Some of these third parties may be located outside Queensland or Australia. Where reasonable, we will take steps to ensure that any overseas recipients will protect your personal information in a manner consistent with privacy requirements.

Our privacy policy explains how we manage personal information, how you can seek access to or correction of your information, and how you can make a privacy complaint. A copy is available at www.kbsc.com.au or by contacting us using the details below.

If you have any questions, or if you wish to access or correct your personal information, please contact:

Company Secretary
Email: Secretary@kbsc.com.au
Keppel Bay Sailing Club Ltd.