

1. OBJECTIVE

The Privacy Policy applies to personal information collected by the Merrylands RSL Club Group hereafter referred to as “the Club”, as the Club is an applicable organisation under the Privacy Act 1988 and Privacy Amendment [Enhancing Privacy Protection] Act 2012 [the Privacy Act]. This Policy equally applies to the Clubs subsidiary, Club Umina. The Privacy Act governs the way private sector organisations collect, use, keep secure, and disclose personal information.

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 you read and understand the Privacy Policy and keep it for your future reference.

Should you require any clarification, you can contact us as referred at the end of the document.

2. SCOPE

2.1. Personal information

- (a) Under the provisions of the Privacy Act, ‘personal information’ means information or an opinion, whether true or not and whether recorded in a material form or not, about an individual whose identity is reasonably identifiable, from the information or opinion.
- (b) Some examples of personal information are your name, residential address, email address, bank details, photos, and opinions on your likes and dislikes that can identify you.

2.2. Sensitive Information

- (a) Sensitive information is a subset of personal information.
- (b) It means information or an opinion about an individual’s racial or ethnic origin, political opinions, membership of a political organisation, religious beliefs or affiliations, philosophical beliefs, membership of a professional, or trade association, membership of a trade union, sexual orientation, or practices.
- (c) It also includes the criminal record, health information, genetic information or biometric information that may be used for the purpose of automated biometric verification or biometric identification or biometric templates about an individual.

2.3. Collection of Sensitive Information

- (a) In general, we attempt to limit the collection of sensitive information we may obtain from you, but depending on the uses you make of our products this may not always be possible and we may collect sensitive information from you in order to carry out the services provided to you.

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- (b) The type of sensitive information we may collect from you or record about you is dependent on the services provided to you by the Club and will be strictly limited to the purpose(s) for which it is collected.
- (c) We will not use sensitive information to send you Direct Marketing Communications [as defined in clause 8 below] without first obtaining your consent.
- (d) We will not collect sensitive information from you without your consent unless required by law.

2.4. Consent to collection of certain types of sensitive information

- (a) We may collect certain types of sensitive information where you have consented and agreed to the collection of such information.
- (b) We will obtain your consent at [or around] the point in time in which we collect the information. The main type of sensitive information that we may collect (if any) will usually relate to your:
 - (i) Criminal record (if any);
 - (ii) Special food or dietary requirements due to medical, cultural or religious reasons;
 - (iii) Biometric identification, such as facial images;
 - (iv) Membership of political organisations and political opinions;
 - (v) Racial origin and religious beliefs, to the extent these are ascertainable from any photographic identification (such as a driver's licence or passport);
 - (vi) Philosophical beliefs, if applicable; and
 - (vii) Health or medical information,

But only if the sensitive information is necessary for, or incidental to, the purposes of collection set out in clause 2.3(a).

3. WHY AND WHAT WE MAY COLLECT - YOUR PERSONAL INFORMATION

- (a) We will only collect personal information that is necessary for us to provide our products and services to you, including Club membership. This depends ultimately upon the purpose of collection and we have set out the general purposes of collection listed in clauses 4(a) & 4(b). We will be unable to allow you to join the Club or to be a temporary member, unless you have provided us with the required information.
- (b) The type of information that we may collect about you includes (but is not limited to) the following:
 - (i) Your contact information such as full name (first and last), e-mail address, current postal address, delivery address (if different to postal address) and phone numbers;
 - (ii) Details relating to your employment (if applicable) or your previous employment, which shall include, but is not limited to, obtaining your tax file number and superannuation details;
 - (iii) Your date of birth;
 - (iv) Proof of your identity and the associated details related to such (including, but not limited to, driver's licence, passport, birth certificate);
 - (v) Any sensitive personal information listed in clause 2.4(b);
 - (vi) If applicable, emergency contact details;

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- (vii) Details required as part of your Club membership or visitation, including but not limited to the information required under the members and visitors registers;
- (viii) Whether you participated in any activity or event organized by the Club;
- (ix) Photographs or video footage taken at the Club's premises, which may include you;
- (x) Your opinions, statements and endorsements collected personally or via surveys and questionnaires, including but not limited to your views on the products and services offered by the Club;
- (xi) If you are requesting products or services from us or we are purchasing goods or services from you, then any relevant payment or billing information (including but not limited to bank account details, direct debit, credit card details, billing address, repayment Information, and invoice details).
- (xii) Information about any special food or dietary requirements
- (xiii) If you participate in the Club's gaming machine loyalty program; information regarding your gaming machine usage and expenditure. We may also collect information if you participate in Keno, TAB, bingo or trade promotion lotteries.
- (xiv) The Club may periodically require patrons to provide information and/or evidence of their source of funds and wealth in order to continue playing gaming machines
- (xv) As far as possible or unless provided otherwise under this privacy policy, we will collect your personal information directly from you. If we collect details about you from someone else, wherever reasonably possible, we will take all steps necessary to advise you we have done this and the reason for it.
- (xvi) When you engage in certain activities, such as entering a contest or promotion, filling out a survey or sending us feedback, we may ask you to provide certain information, which you may withhold or provide at your own discretion. It is optional for you to engage in these activities.
- (xvii) Depending upon the reason for requiring the information, some of the information we ask you to provide we may identify as mandatory or voluntary. If by choice you do not provide the mandatory data or any other information we require in order for us to provide our services to you, as a consequence we may be unable to provide or effectively provide our services to you.
- (xviii) If you use our website, we may utilise 'cookies' which enable us to monitor traffic patterns and to serve you more efficiently if you revisit our website. A cookie does not identify you personally but may identify your internet service provider or computer. You can set your internet browser to notify you when you receive a cookie and this will provide you with an opportunity to either accept or reject it in each instance.

4. USE AND DISCLOSURE OF YOUR PERSONAL INFORMATION

- (a) We will only use or disclose your personal information for the primary purposes for which it was collected or as consented to and/or in circumstances as set out below.
- (b) You consent to us using and disclosing your personal information to facilitate a purpose in connection with:
 - (i) If required, the verification of your identity, including the verification of your date of birth, if applicable;

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- (ii) Facilitating membership or visitation requirements (for example, entry into the Register of Members, which is available for public inspection by other members);
- (iii) Provision of our products and services to you, which shall include but is not limited to:
 - (A) The administration and management of our products and services, including charging, billing, credit card authorisation and verification, checks for financial standing, creditworthiness (including but not limited to undertaking an assessment for credit loss and obtaining credit references, if applicable), fraud and collecting debts; and
 - (B) To offer you updates, or other content or products and services that may be of interest to you;
- (iv) To facilitate the administration, management and improvement of the Club, including but not limited to:
 - (A) The use of your personal information collected in accordance with clause 3(a) above in the administration and management of the Club;
 - (B) Communications between Member Clubs [being those clubs which are members of ClubsNSW], including but not limited to reciprocal arrangements and sharing of industry news;
 - (C) The management, governance and administration of the Club, including but not limited to any management and governance meetings of the Club;
- (v) If applicable, any requirement to include you in various registers maintained by the Club including, but not limited to, the register of excluded persons;
- (vi) Facilitating medical assistance in the event of a medical emergency, or to provide you with medical treatment as requested by you;
- (vii) Your participation in any activity or event organised by the Club or a third party organisation;
- (viii) Your ability to attend other Member Clubs in Australia or New Zealand;
- (ix) Co-ordinating, managing and maintaining good order and security of the Club and our premises, which shall include but is not limited to protecting the rights and safety of other parties on our premises;
- (x) Investigating and reporting information to third parties regarding any accidents or incidents that may have occurred on our premises;
- (xi) The improvement of our services (including to contact you about those improvements and asking you to participate in surveys about our products and services);
- (xii) The maintenance and development of our products and services, business systems and infrastructure;
- (xiii) Marketing and promotional activities by us and our related bodies (including by direct mail, telemarketing, email, SMS and MMS messages) such as our customer loyalty programs and newsletters;
- (xiv) To provide customer service functions, including handling customer enquiries and complaints;
- (xv) To offer you updates, or other content or products and services that may be of interest to you;
- (xvi) Our compliance with applicable laws and regulations;

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- (xvii) The transfer, and matters in connection with a potential transfer, of the Club to another entity; and
- (xviii) Any other matters reasonably necessary to continue to provide our products and services to you.

(c) We may also use or disclose your personal information in the following circumstances where we are not required to seek your additional consent:

- (i) When it is disclosed or used for a purpose related to the primary purposes of collection detailed above and you would reasonably expect your personal information to be used or disclosed for such a purpose (secondary use);
- (ii) If we reasonably believe that the use or disclosure is necessary to lessen or prevent a serious or imminent threat to an individual's life, health or safety or to lessen or prevent a threat to public health or safety;
- (iii) If we have reason to suspect that an unlawful activity has been, or is being, engaged in; or
- (iv) If it is required or authorised by law or formally requested by a statutory or regulatory authority.

(d) In the event we propose to use or disclose such personal information other than for reasons specified in this policy, we will first seek your consent prior to such disclosure or use.

(e) If you have received communications from us and you no longer wish to receive those sorts of communications, you should contact us via the details set out at the end of this document and we will ensure the relevant communication ceases.

(f) Any other use or disclosure we make of your personal information will only be as required by law or as permitted by the Privacy Act 1988 or by this privacy policy or otherwise with your consent.

5. THE TYPES OF ORGANISATIONS TO WHICH WE MAY DISCLOSE YOUR PERSONAL INFORMATION

(a) We may disclose your personal information to other organisations. Examples of organisations and/or parties that your personal information may be provided include:

- (i) The organisation who operate the Clubs membership information system
- (ii) The Club Group's Point of Sale [POS] when using membership cards, credit/ debit cards for purchases in the Clubs other Member Clubs;
- (iii) Club Industry Bodies such as: Clubs NSW and its related bodies, and the RSL and Services Clubs Association;
- (iv) if applicable, Clubs Australia and Club New Zealand, and member clubs of Clubs Australia and Clubs New Zealand;
- (v) Offshore service providers, if any;
- (vi) related entities and subsidiaries of the Club;
- (vii) Third parties, such as trade suppliers and club sponsors;
- (viii) Our contractors and agents, including but not limited to our professional advisors such as accountants, solicitors and auditors or other companies who assist us in providing our products and services to you and;
- (ix) Where permitted or required by law, on reasonable grounds we may disclose personal information we hold to law enforcement bodies (such as the New South

Wales Police Force), emergency services (including police, ambulance services and fire brigades), government agencies, regulatory authorities, or other public bodies.

- (b) The disclosure of your personal information to these organisations and/or parties will only occur in relation to the goods or services we provide to you or for a purpose permitted by this privacy policy.
- (c) We will take such steps as are reasonable to ensure that these organisations and/or parties are aware of the provisions of this privacy policy in relation to your personal information.

6. Photographs, Closed Circuit Television and other Recording Devices

- (a) We use closed circuit televisions (CCTV) at certain locations throughout our premises (e.g. entry and exit) and surrounding areas.
- (b) Footage obtained from personal cameras carried by some of our staff and security contractors may be used when dealing with any incidents on the Club premises.
- (c) Photographs are also taken for Club membership records as well as at some special events on the Club premises.
- (d) The CCTV is integral to our security system and CCTV images are stored for a minimum 'retention period' of at least twenty-one [21] days unless a reportable incident is identified.
- (e) In such cases, the Club will archive such images and retain the footage for a minimum period of seven [7] years after the retention period unless provided to the relevant authority i.e. NSW Police Force or government Inspector for investigation purposes or in instances where public liability is involved. The Club must archive CCTV footage if requested by the relevant authority. Note: If an incident occurs at the venue, CCTV footage for the period leading up to, during and following the incident must be archived and where no incident has been identified, the CCTV footage is automatically deleted as determined by the Clubs CCTV system and relevant storage space. This is generally within forty [40] days after the retention period.
- (f) As indicated in clause 6(c) above, we may take photographs of you attending our premises, and we may wish to use them for marketing and advertising purposes.
- (g) Unless you advise us otherwise, you expressly agree and consent to the use of any photographs, which may include you, for the aforementioned purposes, without compensation.

7. USE OF FACIAL RECOGNITION TECHNOLOGY

- (a) We use facial recognition technology within our premises for security, safety and regulatory compliance purposes, including identifying persons on exclusion or banned lists. This technology involves the collection of facial images and biometric information, which is treated as sensitive information under the Privacy Act 1988 (Cth).
- (b) We will only collect biometric information where it is reasonably necessary for our functions and with your consent, unless an exception applies under Australian privacy law. Information will be used and disclosed only for the purpose for which it was collected, or where required or authorised by law.
- (c) We take reasonable steps to ensure biometric information is secure, accurate and retained only for as long as necessary, after which it will be securely destroyed or de-identified. Individuals may access or request correction of their personal information in accordance with this Privacy Policy.

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8. DIRECT MARKETING

- (a) Direct marketing involves the use and/or disclosure of personal information to communicate directly with an individual to promote goods and services. Direct Marketing includes channels such as telephone, SMS, mail, email and online advertising. You expressly consent to us using your personal information, including any email address you give to us, to provide you with information and to tell you about our products, services, events, or any other direct marketing activity (including third party products, services, and events) which we consider may be of interest to you.
- (b) Without limitation to clause 8(a) above, if it is within your reasonable expectations that we send you Direct Marketing Communications given the transaction or communication you have had with us, then we may also use your personal information for the purpose of sending you Direct Marketing Communications, which we consider, may be of interest to you.
- (c) You expressly consent to us disclosing your personal information to other organisations [including but not limited to organisations such as those listed in clause 5(a) above], that may also use your personal information for sending you Direct Marketing Communications. The Club shall, on request, notify an individual of its source of the individual's personal information that it has used or disclosed for the purpose of direct marketing unless this is unreasonable or impracticable to do so.

8.1. Opt out of Direct Marketing communications

- (a) If at any time, you do not wish to receive any further Direct Marketing communications from us, or others [under clause 8(a) above], you may ask us not to send you any further information about products and services and not to disclose your information to other organisations for that purpose.
- (b) You may do this at any time by using the "unsubscribe" facility included in the email or by contacting us via the details set out at the end of this document. The Club will within fourteen [14] days give immediate effect to that request, there will be no fee charged attributed to an individual for making such request.

9. DATA QUALITY AND SECURITY

- (a) We have taken steps to help ensure your personal information is safe. You will appreciate, however, that we cannot guarantee the security of all transmissions or personal Information, especially where the Internet is involved.
- (b) Notwithstanding the above, we will take reasonable steps to:
 - (i) Make sure that the personal information we collect, use or disclose is accurate, complete and up to date;
 - (ii) Protect your personal information from misuse, loss, unauthorised access, modification or disclosure both physically and through computer security methods; and
 - (iii) Destroy or permanently de-identify personal information if it is no longer needed for its purpose of collection

- (c) However, the accuracy of personal information depends largely on the information you provide to us, so we recommend that you:
 - (i) Let us know if there are any errors in your personal information; and
 - (ii) Keep us up-to-date with changes to your personal information (such as your name or address or contact details).

10. DATA BREACH MANAGEMENT

- (a) The Club takes reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification or disclosure.
- (b) In the event of a suspected or actual data breach, involving personal information held by the Club, the Club would promptly investigate the incident and take appropriate steps to contain and remediate the breach.
- (c) Where a data breach is likely to result in serious harm to individuals, the Club will comply with its obligations under the Notifiable Data Breaches scheme by notifying affected individuals and the Office of the Australian Information Commissioner, as required by law. The Club maintains procedures to identify, assess and respond to data breaches and will review and update those procedures as necessary to ensure ongoing compliance with applicable privacy laws.

11. OVERSEAS DISCLOSURE OF PERSONAL INFORMATION

- (a) The Club does not directly disclose personal information to overseas recipients.
- (b) However, the Club may use third-party service providers (such as cloud-based software providers, membership management systems, email communication services or IT support providers) to help operate the Club and deliver services to members. Some of these service providers may store or process personal information on servers located outside Australia.
- (c) Where personal information is handled by overseas service providers, the Club takes reasonable steps to ensure that the information is protected and that the service provider complies with privacy standards that are substantially similar to those required under Australian privacy law, including the Australian Privacy Principles.
- (d) The countries in which overseas service providers may be located can change from time to time but commonly include countries where major cloud service providers operate, such as the United States.
- (e) By providing personal information to the Club, you acknowledge that your information may be handled by third-party service providers in this way.

12. AUTOMATED AND THIRD PARTY SYSTEMS

- (a) The Club uses a variety of systems, including membership management, ID scanning, Point of Sale, car park access, promotions, gaming, and staff systems (such as payroll and rostering). These systems may change from time to time.
- (b) Some systems use automated processes, meaning decisions or actions may be made, or substantially assisted, by software using personal information. This may include determining membership status, applying discounts or benefits, granting or restricting access, managing promotions, scheduling staff, or meeting legal obligations.

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- (c) These automated processes may affect the rights or interests of members, visitors, or staff. Human oversight is applied where appropriate, and individuals can request information about decisions involving their personal information.
- (d) Personal information may be shared with third-party service providers to operate these systems and, in some cases, stored or processed outside Australia. We take steps to ensure all personal information is handled in accordance with Australian privacy law.

13. ACCESS TO AND CORRECTION OF YOUR PERSONAL INFORMATION

- (a) We will provide individuals with access to their personal information upon request, except where we are required or authorised by law to refuse access.
- (b) This includes circumstances where providing access would be unlawful, would prejudice enforcement-related activities, legal proceedings, or negotiations, would pose a serious threat to life, health or safety, or where another exception under the Privacy Act 1988 (Cth) applies.
- (c) Where access is refused, we will provide written reasons for the refusal and information on how to make a complaint, unless it would be unreasonable or unlawful to do so.
- (d) You are also entitled to edit and correct such information if the information is inaccurate, out of date, incomplete, irrelevant, or misleading.
- (e) If you would like access to or correct any records of personal information, we have 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.

14. ANONYMITY/PSEUDONYMITY

- (a) Where lawful and practicable, individuals may interact with the Club anonymously or by using a pseudonym, including when making general enquiries. However, the Club may require identification where it is reasonably necessary to provide services, comply with its obligations under registered club, liquor, gaming or other applicable laws, verify membership, process transactions, or ensure the safety and security of patrons, members, staff and the Club's premises.

15. CHILDREN AND VULNERABLE PERSONS

- (a) The Club recognises the need for special care when handling personal information about children and other vulnerable persons. We only collect, use or disclose such information where it is reasonably necessary for our functions or legal obligations (for example in connection with incidents, welfare or safety matters, age-restricted areas, or gambling harm-minimisation) and, where practicable, with appropriate consent from a parent, guardian or responsible adult. Personal information about minors or vulnerable persons will be managed confidentially, securely and in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles.

16. CONSENT

- (a) You are agreeing to the terms of this privacy policy if you join as a member or visit the Club, use our website or by accepting the terms of one of our terms and conditions (relating to a product or service offer) which is referred to in this privacy policy.
- (b) We reserve the right to modify the privacy policy as our business needs require.
- (c) We will notify you of such changes (whether by direct communication or by posting a notice on our website), after which, your continued use of our products, services or website or your continued dealings with us shall be deemed to be your agreement to the modified terms.
- (d) If you do not agree to our continued use of your personal information due to the changes in our Privacy Policy, please contact us via the details set out at the end of this document.

17. CHANGES TO THIS PRIVACY POLICY

- (a) The Club may update this Privacy Policy from time to time to reflect changes to its practices, operational requirements, or where there are significant changes to applicable privacy laws or regulatory guidance.
- (b) Where a change is material or relates to significant legal or regulatory developments, the Club will take reasonable steps to notify members and other affected individuals, such as by publishing an updated version of the Privacy Policy on the Club's website or by providing notice through other appropriate communication channels.
- (c) The most current version of this Privacy Policy will always apply and will be available from the Club upon request or on the Club's website. The effective date of the Privacy Policy will be updated each time changes are made.

18. STAFF TRAINING AND PRIVACY GOVERNANCE

- (a) The Club is committed to ensuring that personal information is handled in accordance with applicable privacy laws and this Privacy Policy.
- (b) The Club takes reasonable steps to ensure that directors, officers, employees, contractors and volunteers who handle personal information are aware of their privacy obligations and receive appropriate training relevant to their roles.
- (c) The Club maintains governance arrangements to support compliance with privacy requirements, including assigning responsibility for privacy oversight, maintaining policies and procedures for the handling of personal information, and periodically reviewing its privacy practices. Privacy training and governance arrangements are reviewed and updated as necessary, including where there are significant changes to the Club's operations or applicable privacy laws.

19. MISUSE OF PERSONAL INFORMATION AND CRIMINAL OFFENCES

- (a) Personal information collected by the Club must be handled responsibly. Deliberately accessing, using, or sharing someone's personal information without permission, especially in a way that could cause harm (such as "doxing"), may be a breach of privacy laws and, in some cases, a criminal offence.

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- (b) The Club takes steps to prevent misuse of personal information and will respond appropriately if such conduct occurs, which may include disciplinary measures or reporting to relevant authorities in accordance with the law.

20. SERIOUS INVASION OF PRIVACY AND LEGAL COMPLIANCE

- (a) The Club is committed to handling personal information responsibly. Under Australian privacy law, individuals have rights to seek remedies for serious invasions of their privacy. The Privacy Act 1988 also gives regulators expanded powers to investigate breaches and imposes increased penalties for serious or repeated privacy violations. The Club takes these obligations seriously and strives to comply fully with all legal requirements.

21. YOUR COMPLAINTS

- (a) To resolve a complaint, we:
 - (i) Will liaise with you to identify and define the nature and cause of the complaint;
 - (ii) May request that you provide the details of the complaint in writing;
 - (iii) Will keep you informed of the likely time within which we will respond to your complaint; and
 - (iv) Will inform you of the legislative basis (if any) of our decision in resolving such a complaint
- (b) We will keep a record of the complaint and any action taken in a privacy register.

22. RESOLVING PRIVACY COMPLAINTS

- (a) We have put in place an effective mechanism and procedure to resolve privacy complaints.
- (b) We will ensure the Club deals with all complaints within a reasonably appropriate timeframe so that any decision (if any decision is required to be made) is made expeditiously and in a manner, that does not compromise the integrity or quality of any such decision.
- (c) If you have any concerns or complaints about the manner in which we have collected, used or disclosed and stored your personal information, you can tell us by contacting us on the details below or alternatively you can contact the Office of the Australian Information Commissioner (OAIC).

Telephone: 02 8868 7777

Email: enquiries@merrylandsrsl.com.au

Post: P.O Box 417 Merrylands NSW 2160

Please mark your correspondence to the attention of the Club Chief Executive Officer [CEO].