Privacy Policy

Noble Park Football Social Club LTD t/as Club Noble

Effective Date: 26/12/2025 **ACN:** 12 006 197 566

1. Introduction

Noble Park Football Social Club LTD trading as Club Noble ("the Club", "we", "us", or "our") is committed to protecting the privacy of our members, guests, and employees. We are bound by the **Australian Privacy Principles (APPs)** contained in the *Privacy Act 1988* (Cth).

This Privacy Policy sets out how we collect, use, store, and disclose your personal information.

2. The Information We Collect

We collect personal information that is reasonably necessary for us to carry out our activities and provide services to you. The types of information we may collect include:

- **Identification Details:** Name, address, date of birth, and contact details (email, phone number).
- **Membership Information:** Membership number, join date, and membership category.
- **Identification Documents:** Driver's license details or other ID scanned upon entry (as required by Liquor Licensing laws).
- **Financial Information:** Payment details for membership fees, function payments, or dining (credit card details are typically processed securely and not stored permanently).
- **Gaming and Loyalty Data:** If you use a membership card in gaming machines or at points of sale, we may collect data on your transaction history, points accrued, and redemption history.
- **Surveillance:** CCTV footage from cameras located within and around the Club premises for security and safety purposes.

3. How We Collect Information

We collect personal information directly from you whenever possible. This occurs when you:

- Complete a membership application form (online or in paper).
- Sign in as a visitor or guest using our electronic sign-in system.

- Swipe your membership card at a kiosk, point of sale, or gaming machine.
- Purchase tickets for shows, raffles, or events.
- Visit our website or contact us via email or telephone.

4. Purpose of Collection and Use

We collect, hold, and use your personal information for the following purposes:

- **Administration:** To manage your membership, renew subscriptions, and maintain our membership register.
- **Service Delivery:** To provide you with goods, services, and benefits (e.g., food, beverage, gaming, and rewards).
- **Communication:** To send you newsletters, annual reports, and information about Club events, promotions, and special offers (unless you have opted out).
- **Compliance:** To meet our legal obligations under the *Liquor Control Reform Act 1998*, *Gambling Regulation Act 2003*, and *Anti-Money Laundering and Counter-Terrorism Financing Act 2006*.
- **Safety:** To maintain the security of our venue via CCTV and incident reporting.

5. Disclosure of Personal Information

We do not sell your personal information to third parties. However, we may disclose your information to:

- **Service Providers:** Third-party contractors who provide services to us (e.g., IT support, mailing houses, marketing agencies, auditors) who are also bound to protect your privacy.
- **Regulatory Bodies:** Law enforcement agencies, the Victorian Gambling and Casino Control Commission (VGCCC), or other government bodies where required by law.
- **Reciprocal Clubs:** If you visit another club using reciprocal rights, limited information may be shared for verification.

6. Marketing and Opt-Out

We may use your personal information to send you marketing materials about Club Noble. You have the right to opt out of receiving these communications at any time by:

- Clicking the "Unsubscribe" link in our emails.
- Contacting the Club directly.
- Adjusting your preferences at the membership kiosk (if applicable).

7. Data Security

We take reasonable steps to protect your personal information from misuse, interference, loss, unauthorised access, modification, or disclosure. These measures include:

- Secure physical storage of paper records.
- Password-protected electronic databases and firewalls.
- Restricted access to personal information to only those staff who need it to perform their duties.

8.Biometric Data & Facial Recognition

Collection: We collect "biometric information" (which is sensitive information under the *Privacy Act 1988*) via our facial recognition system. This occurs the moment you enter the venue or gaming areas.

Purpose: This collection is reasonably necessary for:

- Enforcing self-exclusion and venue-banning orders.
- Preventing serious unlawful activity or threats to the safety of patrons and staff.
- Meeting our obligations under the *Liquor Control Reform Act* and gaming regulations.

Retention & Deletion: * **Non-Matches:** Biometric templates for patrons who are not on an exclusion list are deleted within 24 hours.

- **Matches:** Data relating to identified excluded individuals is retained only for as long as necessary to manage the exclusion.

Your Rights: You have the right to request access to any personal information we hold about you. If you have concerns about our use of facial recognition, please contact our Privacy Officer at **manager@clubnoble.com.au**.

9. Access and Correction

You have the right to request access to the personal information we hold about you and to ask for corrections if it is inaccurate, out of date, or incomplete.

- **To make a request:** Please contact the Privacy Officer in writing.
- **Verification:** We will require you to verify your identity before releasing information.

- **Refusal:** In some limited circumstances allowed by law (e.g., where access would compromise a police investigation), we may refuse access.

10. Changes to this Policy

We may update this Privacy Policy from time to time to reflect changes in our operations or the law. The current version will always be available on our website and at the Club reception.

11. Contact Us

If you have any questions about this Privacy Policy, or if you wish to make a complaint about how we have handled your personal information, please contact:

The Privacy Officer / General Manager Noble Park Football Social Club LTD t/as Club Noble Address: 46-56 Moodemere Street, Noble Park Victoria 3174

Email: enquiries@clubnoble.com.au

Phone: 03 9546-0653