



Privacy Policy

KURRAWA

SURF CLUB

1. Privacy & Protection Policy

Kurrawa Surf Club values and respects the privacy of the people we deal with. Kurrawa Surf Club is committed to protecting your privacy and complying with the Privacy Act 1988 (Cth) (Privacy Act) and other applicable privacy laws and regulations.

This Privacy Policy (Policy) describes how we collect, hold, use, and disclose your personal and sensitive information and how we maintain its quality and security.

2. What is personal information?

“Personal information” means any information or opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable. In general terms, this includes information or an opinion that personally identifies you either directly (e.g. your name) or indirectly.

3. What is sensitive information?

“Sensitive information” is any personal data that is about a person’s

- a. health, health treatment, or other medical needs
- b. race, ethnicity or religion
- c. professional or political affiliations and memberships
- d. criminal record
- e. sexuality
- f. disability status
- g. religious or philosophical beliefs
- h. trade union membership, or
- i. genetic or biometric data.

4. What personal and sensitive information do we collect?

The personal information we collect about you depends on the nature of your dealings with us or what you choose to share.

The personal or sensitive information we collect about you may include:

- Full name;
- mailing or street address;
- date of birth;
- email address;
- phone number



You do not have to provide us with your personal or sensitive information. Where possible, we will give you the option to interact with us anonymously or by using a pseudonym. However, if you choose to deal with us in this way or choose not to provide us with your personal or sensitive information, we may not be able to provide you with our services (such as gaming) or otherwise interact with you.

5. How do we collect your personal and sensitive information?

We collect your personal information directly from you when you:

- interact with us over the phone;
- interact with us in person;
- interact with us online;
- participate in surveys or questionnaires;
- attend a Kurrawa Surf Club event;
- subscribe to our mailing list;
- apply for a position with us as an employee, contractor, or volunteer;
- present on the gaming floor, regardless of gameplay, with Electronic Gaming Machines (Facial Recognition Technology)

6. How do we use your personal or sensitive information?

We use personal or sensitive information for many purposes in connection with our functions and activities, including the following purposes:

- provide you with information or services that you request from us;
- deliver to you a more personalised experience and service offering;
- improve the quality of the services we offer;
- internal administrative purposes;
- marketing and research purposes;
- identifying individuals/or members that are (self)/excluded and/or banned from the Club or gaming floor;
- identifying individuals that have committed or intend to commit the criminal offence of theft, money laundering or terrorism financing.

7. Disclosure of personal or sensitive information to third parties

We may disclose your personal or sensitive information to third parties in accordance with this Policy in circumstances where you would reasonably expect us to disclose your information. For example, we may disclose your personal information to:

- our third-party service providers (for example, our IT providers - Netway);
- our marketing providers, Talkbox;
- our professional services advisors;
- our Licenced Monitoring Operator, (Odyssey);
- local or federal police authorities in the event of suspected suspicious activity in relation to theft, money laundering or terrorism financing.



8. Transfer of personal information overseas

Some third-party service providers we disclose personal information to may be based in or have servers outside of Australia, including in Asia/Pacific.

Where we disclose your personal information to third parties overseas, we will take reasonable steps to maintain data security and appropriate privacy practices. We will only disclose to overseas third parties if:

- you have given us your consent to disclose personal information to that third party; or
- we reasonably believe that:
 - the overseas recipient is subject to a law or binding scheme that is, overall, substantially similar to the Australian Privacy Principles; and
 - the law or binding scheme can be enforced; or
- the disclosure is required or authorised by an Australian law or court/tribunal order.

9. How do we protect your personal and sensitive information?

Kurrawa Surf Club will take reasonable steps to ensure that the personal and sensitive information that we hold about you is kept confidential and secure, including by:

- having a robust physical security of our premises and databases / records;
- taking measures to restrict access to only personnel who need that personal or sensitive information to effectively provide services to you;
- having technological measures in place (for example, anti-virus software, fire walls, MFA (multi-factor authentication) is configured to access the file storage systems).

10. Online activity

Cookies

The Kurrawa Surf Club website uses cookies. A cookie is a small file of letters and numbers the website puts on your device if you allow it. These cookies recognise when your device has visited our website(s) before, so we can distinguish you from other users of the website. This improves your experience and Kurrawa Surf Club's website.

We do not use cookies to identify you, just to improve your experience on our website. If you do not wish to use the cookies, you can amend the settings on your internet browser so it will not automatically download cookies. However, if you remove or block cookies on your computer, please be aware that your browsing experience and our website's functionality may be affected.

Website analytics

Our website uses www.wix.com to help us better understand visitor traffic, so we can improve our services. Although this data is mostly anonymous, it is possible that under certain circumstances, we may connect it to you.



Direct marketing

We may send you direct marketing communications and information about our services, opportunities, or events that we consider may be of interest to you if you have requested or consented to receive such communications.

These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the Australian Spam Act 2003 (Cth). You consent to us sending you those direct marketing communications by any of those methods. If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.

You may opt-out of receiving marketing communications from us at any time by [following the instructions to "unsubscribe" set out in the relevant communication] / [contacting us using the details set out in the "How to contact us" section below].

In addition, we may also use your personal information or disclose your personal information to third parties for the purposes of advertising, including online behavioural advertising, website personalisation, and to provide targeted or retargeted advertising content to you (including through third-party websites).

11. Retention of personal information

We will not keep your personal information for longer than necessary. In most cases, this means that we will only retain your personal information for the duration of your relationship with us unless we are required to do so to comply with applicable laws, such as record-keeping obligations.

12. How to access and correct your personal information

Kurrawa Surf Club will endeavour to keep your personal information accurate, complete, and up to date.

If you wish to request access to and/or correct the personal information we hold about you, you should request it by contacting us, and we will usually respond within ten days. We will deal with such a request by following the procedure outlined below:

- Either visit Kurrawa Surf Club in person during operating hours or email details to info@kurrawasurf.com.au

13. Links to third-party sites

Kurrawa Surf Club website may contain links to websites operated by third parties. If you access a third-party website through our website(s), personal information may be collected by that third-party website. We make no representations or warranties in relation to the privacy practices of any third-party provider or website, and we are not responsible for the privacy policies or the content of any third-party provider or website. Third-party providers/websites are responsible for informing you about their own privacy practices, and we encourage you to read their privacy policies.

14. Inquiries and complaints

For complaints about how Kurrawa Surf Club handles, processes, or manages your personal or sensitive information, please contact our Operations Manager via operations@kurrawasurf.com.au



Note we may require proof of your identity and full details of your request before we can process your complaint.

Please allow up to ten days for Kurrawa Surf Club to respond to your complaint. Resolving a complaint to everyone's satisfaction will not always be possible. If you are unsatisfied with Kurrawa Surf Club's response to a complaint, you have the right to contact the office of the Australian Information Commissioner (at www.oaic.gov.au/) to lodge a complaint.

15. How to contact us

If you have a question or concern in relation to our handling of your personal information or this Policy, you can contact us for assistance as follows:

Email

info@kurrawasurf.com.au

Contact number

07 55275 660

Post

Attention: Kurrawa Surf Club Privacy Officer

Address: PO Box 1599 Broadbeach QLD 4218