



# Privacy Policy

Bendigo Stadium Limited (BSL)

## Overview

Bendigo Stadium Limited (BSL) is subject to the provisions of the Privacy Act 1988 (the Act). The Act contains 10 National Privacy Principles that set standards for the handling of personal information. BSL is committed ensuring your personal information is protected and to the safeguarding of members, visitors and employee's personal information

## Scope

This policy applies to all members, visitors and employees of BSL. The policy is applicable to BSL in all its operations and functions including those situations where employees are required to work off site. This policy applies to all sites – Bendigo Stadium/Red Energy Arena, The Borough Club, St Arnaud Sporting Club and Swan Hill Indoor Sports and Recreation Centre.

## The Information We Collect & How We Collect it

We may gather various forms of personal information about you, which can include:

- Your full name, gender, date of birth and/or age
- Contact details such as your address, email and phone number
- ID documents such as drivers license or passport
- Payment details including bank account or credit card information
- CCTV images and footage of you
- Details of the products and services you have purchased from us, or enquired about, and any additional information necessary to deliver those products and services and respond to your enquiry
- Any additional information relating to you that you provide to us directly

This information is collected via varied forms, through our website, our restaurant and event booking system, our ID scanning technology, from an application/order form or competition entry form, job applications, email, phone, social media, from third parties such as law enforcement bodies, BSL's service providers and associated entities or other forms of collection.

In addition to the above, it is a legal requirement for gaming venues to record and store CCTV footage for a minimum of 30 days. By entering the venue, you agree to this condition of entry.



## **Anonymity**

You have the option of interacting with BSL anonymously or using a pseudonym where lawful and reasonably possible.

However, certain products and services require personal information (e.g. ID checks in gaming areas) which if not provided may prevent us from providing you with products or services.

## **Purpose and Use of Information**

BSL will only collect, hold and use personal information about you that is reasonably necessary for BSL's operations and providing products and services to you.

BSL may use your personal information for purposes including:

- To verify your identity
- Provide you with information about events you have purchased tickets to
- Provide you with products and services
- Provide you with information that may interest you about other events, products or services offered by BSL and its related bodies corporate
- To facilitate administrative and operational functions
- To comply with legal requirements
- Marketing and marketing analysis to improve BSL products and services
- For security purposes
- To assess your job application
- To provide to our third-party service providers in connection with any of the above

## **Disclosure of Information**

BSL will not disclose personal information to any other organisation or person/s except:

- To our related bodies corporate
- To third parties that provide services under contract to BSL
- Where required or authorised by law
- To relevant authorities if BSL reasonably believes that:
  - there is a threat to an individual's or the public's health and safety or
  - that unlawful activity has been or is being engaged in
- With your consent

Personal information may be used by BSL for marketing purposes to improve its services and to provide information about those services, particularly in regards to gaming promotions.

If any person does not wish to receive information about BSL's services and gaming promotions, BSL will – on request – remove that person's name from its data base.



## **Disclosure of Personal Information Overseas**

BSL may disclose your personal information to third party's outside of Australia due to the use of third party service providers, some of which are located overseas or use infrastructure outside of Australia. At the date of this policy, your personal information may be transferred, stored, processed, used or disclosed overseas by BSL, or BSL's third party service providers to recipients.

BSL takes reasonable steps to ensure that personal information is handled in accordance with Australian privacy laws.

By providing your personal information, you consent to BSL's disclosure of your personal information to overseas recipients in accordance with this policy, and you acknowledge that by consenting BSL will be permitted to disclose your personal information to locations outside Australia.

When you communicate with BSL through third party sites or social media such as Facebook, the social media network may collect and hold your personal information overseas. BSL is not responsible for their privacy practices and recommend reviewing their privacy policies.

## **Access and Correction**

Each person has the right to access any personal information BSL holds on him or her, including the right to correct any such information. The Club will not charge a fee for you to access your personal information. To request access or changes to the information BSL holds about you please contact us.

## **Security of Personal Information**

BSL takes steps to protect any personal information it holds against loss, unauthorised access or use, modification or disclosure. Your personal information is held at BSL or its related bodies corporate venues or offsite using trusted third-party providers.

Our security safeguards include:

- Staff training
- Maintaining computer and network security systems
- CCTV surveillance
- Implementing and regularly updating BSL's data breach response plan
- Destroying or de-identifying personal information when no longer required



Although we employ measures to protect against unauthorised information disclosure, we cannot guarantee the complete security of information transmitted to or by us over the internet. Information transmission occurs at your own risk. The personal information we collect may be disclosed in a manner inconsistent with this Privacy Policy, despite our precautions.

### **Third Parties**

There are some instances where we will be required to provide your personal information to a third party. BSL will take all precautions to ensure your information is kept safe and secure. Below are some examples of third parties that your information may be passed on to:

- Victorian Gambling and Casino Control Commission (VGCCC)
- AUSTRAC
- GFR Pro
- Third party suppliers and contractors that BSL use to operate our business

### **Notifiable Data Breaches Scheme**

In the event of any loss, unauthorised access or disclosure of your personal information that is likely to result in serious harm to you, BSL will investigate and notify you and the Office of the Australian Information Commissioner as soon as practicable, in accordance with the Privacy Act 1988 (Cth).

### **Facial Recognition Technology (FRT)**

At BSL we are committed to protecting your privacy and handling data in an ethical and responsible manner. The information below outlines how we use and safeguard your personal information. By accessing or using our services, you consent to the collection, storage, use, and disclosure of your data as described in this policy:

- On-Premises Processing: All facial recognition and analytics are processed locally within the venue; no video or data is sent to the cloud.
- Limited Data Retention: Facial recognition data is retained only for the period necessary for its intended purpose (such as identifying self-excluded individuals) and is automatically purged in accordance with retention policies.
- Encryption & Access Control: All captured data is encrypted at rest and in transit. Access is restricted to authorised personnel only.
- Compliance & Auditing: Ottica AI systems are designed to meet APP compliance standards and include full audit capabilities to demonstrate lawful use, purpose limitation, and data minimisation.



## **Cookies / Web**

BSL's website uses cookies, which is a small file stored on your computer's browser. This assists in managing customised settings of the website and delivering content.

We collect certain information such as your device type, browser type, IP address, pages you have accessed on our websites and on third-party websites.

Our website may contain links to third-party websites, however BSL is not responsible for the content or privacy practices of websites that are linked to our website.

## **Complaints**

BSL takes its obligations under the Privacy Act 1988 (Cth) seriously. If you have any concerns or wish to make a complaint about a breach of the Privacy Act by BSL, please contact us so that we may attempt to resolve the issue. The complaint should set out as much detail as possible how and why you believe BSL has breached the Act.

Upon receiving a complaint, BSL will consider what action should be taken to resolve the complaint, including if further information or investigation is required. BSL will endeavour to contact you within 30 days of receiving a complaint.

If you are unsatisfied with BSL's response or we do not respond within a reasonable period of time, you may lodge a complaint with the Office of the Australian Information

Commissioner at:

<https://www.oaic.gov.au/privacy/privacy-complaints/lodge-a-privacycomplaint-with-uswww.oaic.gov.au>

GPO Box 5288, Sydney NSW 2001

If you require assistance with lodging the complaint, you can phone their enquiries line on 1300 363 992.

## **How to Contact BSL**

If you have any questions about BSL's privacy practices or this privacy policy, please contact us at [Corporate@bendigostadium.com.au](mailto:Corporate@bendigostadium.com.au)

## **Further Information**

For further information, please refer to Privacy Act 1988.



## GOVERNANCE

### DOCUMENT REVIEW

This policy will be reviewed and updated annually or as needed to keep pace with changes in technology, industry practices, and legislative requirements.

This policy document is to be distributed to all current and new employees and shall be readily accessible on BSL's internal network for consultation at any time. Minor changes such as titles will be actioned as required.