



Privacy Policy: Facial Recognition and Ethical Data Use

At Yarraville Club we are committed to protecting your privacy and handling data in an ethical and responsible manner. This Privacy Policy provides detailed information about our facial recognition system and 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.

1. Collection and Use of Facial Recognition Data:

- 1.1. **Consent and Transparency:** Your privacy matters to us. By entering our premises, you provide explicit consent for the collection and use of your facial image for the purpose of facial recognition. We are dedicated to maintaining transparency, and we ensure that your consent is obtained before any data processing occurs.
- 1.2. **Limited Tracking:** Our facial recognition system focuses solely on individuals registered in our authorized database. We do not collect or retain information on individuals who are not part of our database. This ensures that the system operates within the boundaries of our authorized network and respects the privacy of those who are not registered.
- 1.3. **Self-Exclusion and Responsible Gambling:** In collaboration with Club Care, we have implemented a self-exclusion mechanism. This mechanism enables us to identify and prevent the entry of self-excluded individuals into our premises. By partnering with Club Care, we promote responsible gambling practices and provide support to individuals who choose to self-exclude.

2. Data Retention and Destruction:

- 2.1. **Image Expiration and Privacy:** We are committed to upholding ethical data practices. To safeguard your privacy, any facial images utilized for facial recognition purposes have a predefined expiration date. Once this expiration date is reached, the images are promptly and permanently destroyed, ensuring that they are no longer accessible or usable.
- 2.2. **Secure Data Storage:** We understand the importance of secure data storage. Your facial recognition data is stored on secure servers with stringent technical and organizational measures in place to protect against unauthorized access, loss, or alteration. We employ industry-standard security protocols to ensure the confidentiality and integrity of your data.
- 2.3. **Limited Access:** Access to your facial recognition data is strictly limited to authorized personnel who require it for legitimate purposes, such as system maintenance or compliance with legal obligations. We implement strict access controls and only permit authorized individuals to handle and process your data.

3. Ethical Data Use:

- 3.1. **Anonymous Tagging:** We prioritize your privacy and anonymity. Unless you are registered in our authorized database, your facial image is tagged as anonymous within our

facial recognition system. This means that your identity remains protected, and your facial features are not linked to any personally identifiable information.

3.2. Analytics and Reporting: We may utilize anonymized and aggregated data derived from the facial recognition system for statistical analysis and reporting purposes. These analytics help us improve our services and operations. It is important to note that these analytics do not contain any personally identifiable information, ensuring the privacy and confidentiality of individuals.

3.3. Legal Compliance: We are committed to complying with all applicable laws, regulations, and industry standards regarding facial recognition and data protection. This includes adhering to the CCTV legislation for gaming establishments, which mandates the retention of footage for a minimum of 30 days. Our practices align with these requirements while prioritizing privacy and data protection.

4. Your Rights:

4.1. Access and Rectification: You have the right to request access to your facial recognition data and to rectify any inaccuracies or errors. We are dedicated to addressing such requests promptly and in accordance with applicable laws and regulations.

4.2. Withdrawal of Consent: If you wish to withdraw your consent for the use of your facial image, please contact us using the information provided in this Privacy Policy. It is important to note that withdrawal of consent may impact your access to certain services or features.

5. Contact Us:

If you have any questions, concerns, or requests regarding the use of facial recognition technology or our privacy practices, please contact our dedicated Privacy Officer at 03 9689 6033 or info@yarravilleclub.aom.au. Our Privacy Officer is responsible for handling your inquiries in a timely and professional manner.

We value your privacy and are committed to ensuring the ethical use of data through responsible practices and compliance with relevant laws and regulations.

This Privacy Policy is effective as of 15th January 2023 and may be updated from time to time. We encourage you to review this policy periodically for any changes.