Milton Ulladulla Ex-Servos Club Limited
Australian Privacy Principles (APP)
Privacy Policy

Summary: This summary highlights key points about how the Club handles your personal information. It is not a substitute for the full policy below, which should be read in full.

In short:

- **we collect personal information (and, in some cases, sensitive information such as biometric information) to operate as a registered club and to meet our legal obligations;**
- **we use and disclose it for those purposes and related purposes you would reasonably expect, with your consent, or as required or permitted by law;**
- **we may disclose information to service providers and regulators (including AUSTRAC) and, in some cases, recipients overseas;**
- **while we seek to store personal information in Australia where practicable, some of our service providers may store or process information overseas, and we will take such steps as are reasonable in the circumstances to ensure that your personal information is handled in accordance with the APPs;**
- **we take reasonable steps to keep it secure and to retain it only as long as needed; and**
- **you can access or correct your information, opt out of direct marketing, and make a privacy complaint by contacting our Privacy Officer (details at the end of this policy);**
- **some legal obligations (such as AML/CTF "tipping off" rules) may limit what we can tell you in particular circumstances**

1. PURPOSE

1.1 Milton Ulladulla Ex-Servos Club Limited (Club, we, us or our) operates the venues known as Milton Ulladulla Ex-Servos Club and Tomakin Sports & Social Club. In this Privacy Policy, references to the Club, we, us or our mean Milton Ulladulla Ex-Servos Club Limited and, where the context requires, its venues, operations, websites, apps and services. The Club is committed to protecting your privacy and handling your personal information in an open and transparent way. This Privacy Policy explains how we collect, hold, use, disclose, store and otherwise manage personal information in accordance with the Privacy Act 1988 (Cth), including the Australian Privacy Principles (APPs) and the Australian Privacy Principles Guidelines issued by the Australian Information Commissioner. It also explains how you may access and seek correction of your personal information,

how you may make a privacy complaint, and the reasonable steps we take to protect personal information and, where appropriate, to retain, destroy or de-identify it securely.

1.2 This Privacy Policy is available free of charge on the Club website and may also be obtained at reception at our venues on request. If you ask us to provide the policy in a particular form, we will take such steps as are reasonable in the circumstances to give it to you in that form.

1.3 By using the Club website, or otherwise providing your personal information to us, you acknowledge that you have read and understood this Privacy Policy. This acknowledgement does not replace any consent we are required to obtain from you under the Privacy Act.

2. INFORMATION COLLECTED

2.1 In the course of our operations, the Club collects personal information from a wide range of individuals, including members and membership applicants, their guests, visitors to our venues (including licensed areas and functions), users of the Club's websites, individuals who engage with us via social media, competition and promotion entrants, and employees and representatives of suppliers, consultants and contractors.

2.2 Throughout this policy, "personal information" means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether or not the information or opinion is true and whether or not it is recorded in a material form. Some information we handle may also be "sensitive information" for the purposes of the Privacy Act, and we treat that information with additional care as required by law.

2.3 We collect personal information where it is reasonably necessary for our functions and activities as a registered club, including to assess and administer membership applications and renewals; maintain the register of members; provide services and facilities; manage venue entry, bookings, functions and events; administer promotions, gaming, gaming machines, hospitality operations, loyalty and rewards programs; digital account access; payment processing; identity verification; employment applications, safety and security, incident management, responsible service of alcohol and responsible gambling measures, AML/CTF compliance, fraud prevention, and to meet any additional legal and regulatory obligations.

2.4 The personal information we may collect includes, but is not limited to: your name, residential or postal address, email address and telephone number; date of birth, gender, occupation and interests; membership application details, membership details and membership history; government-issued identification details and related records used for identity verification (such as driver's licence, proof of age or passport details); emergency contact details; dietary requirements and allergy information; IP addresses, device identifiers, website usage data and social media interaction data; health information and other sensitive information you provide to us or that we are otherwise permitted to collect; organisational affiliations; criminal history information where relevant and permitted by law; usernames, passwords and account credentials; payment card and bank account details; transaction history; incident, accident and complaint records; employment application details; customer service records; photographs, CCTV footage, video images and audio recordings; information generated through your use of Club facilities and systems, including use of your membership card; and

biometric information such as facial images or templates used for identity verification, security, access control, self-exclusion management, venue exclusion management or harm minimisation purposes.

2.5 The Club will only collect sensitive information, including biometric information, where that collection is reasonably necessary for our functions or activities and with your consent where required by law, or where otherwise authorised or permitted under the APPs or other applicable law. Any consent will generally be express, though in limited circumstances it may be clearly implied from your conduct where appropriate and lawful. We do not assume your consent merely because you attend our venues. Where we collect biometric information, we will do so only for legitimate operational purposes, including identity verification, security, self-exclusion management, venue exclusion management and harm minimisation, and only where the collection is reasonably necessary for, and proportionate to, that purpose, and we will apply additional safeguards appropriate to the sensitivity of that information. Where we collect or use biometric information for identity verification or customer due diligence we will generally seek your consent before doing so and will provide you with sufficient information about that collection, unless an exception under the Privacy Act or the AML/CTF Act applies.

3. METHODS OF COLLECTION

3.1 We collect personal information through a wide range of channels, both directly from you and from third-party sources. Direct collection occurs when you apply for or renew membership, attend our venues, sign in a guest, make a booking, use the Club website, create or use a digital account, enter a promotion, participate in a loyalty or rewards program, make a payment, submit an enquiry, apply for employment or otherwise interact with us - including through membership and rewards program applications, venue sign-in processes, point of sale systems, telephone calls, emails, forms, and our websites, apps and social media pages. We may also collect information indirectly through cookies, app analytics tools, Wi-Fi services, website analytics tools, CCTV, security and access control systems, incident and complaint records, gaming machine and self-exclusion processes, recruitment platforms, contractors, service providers, referees and publicly available sources.

3.2 As part of our customer due diligence under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth), we also collect personal information from identity verification, know-your-customer (KYC) and politically exposed person (PEP) and sanctions screening providers, including the results of those checks.

3.3 We will only collect personal information where it is reasonably necessary for our functions and activities or where required or permitted by law. In many cases, the circumstances will make it clear that we are collecting personal information. Where the Privacy Act requires us to notify you about the collection of your personal information, we will take reasonable steps to do so at or before the time of collection, or as soon as practicable afterwards, including by notices on forms, within the Club app, on our website, at our venues or by other appropriate means. Any such collection notice is separate from, and supplements, this Privacy Policy: this policy sets out how we manage personal information generally, while a collection notice deals with a particular instance of collection, and you should read them together. However, in some circumstances we may not provide a notice, or may limit the information in a notice, as described in Section 5.5.

3.4 Where the Club collects personal information from you, we generally do so for the purposes described in this policy, including membership administration, provision of Club services and facilities, legal and regulatory compliance, safety, security, responsible gambling measures, and marketing where permitted. Some collection is required or authorised by laws applying to registered clubs and companies, including the Registered Clubs Act 1976 (NSW), the Corporations Act 2001 (Cth), the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth), the Gaming Machines Act 2001 (NSW) and associated regulations. If you do not provide requested information, we may be unable to process an application, provide services or benefits, verify your identity, or otherwise deal with you effectively. Where the requested information is required for our anti-money laundering and counter-terrorism financing obligations, the consequences of not providing it are described further in Section 5.4.

3.5 We will collect personal information only where, and to the extent that, it is reasonably necessary for the particular function or activity for which it is collected, including our customer due diligence and other AML/CTF obligations, and we will not collect more information than we reasonably require. Where practicable and reasonable to do so, we will collect personal information directly from you, and we will only collect it from a third party (such as an identity verification, KYC, PEP or sanctions screening provider, or another person you have nominated) where direct collection is unreasonable or impracticable, or where the collection is otherwise authorised or required by law.

3.6 Where you provide us with personal information about another person (for example, an emergency contact, a guest you sign in, or a person you nominate), you confirm that you are authorised to provide that information and that you have made that person aware of this Privacy Policy and how we handle personal information.

3.7 The Club may collect personal information about children and young people, for example in connection with junior sport, children's entertainment and supervised activities, family events and functions. Where we collect personal information from or about a person under 18, we will limit our collection to what is reasonably necessary for the relevant activity, take additional care in handling that information, and (where appropriate and lawful) seek the consent of, and provide access and correction rights to, a parent or guardian. We will not knowingly require a child to provide more personal information than is reasonably necessary, and we may restrict a child's access to certain digital services or features where appropriate.

3.8 Our website uses cookies and similar technologies (such as tags, pixels and analytics tools) to recognise you, remember your preferences, measure performance and, where permitted, deliver tailored content and advertising. Some of these technologies are operated by third parties (for example, analytics providers and social media platforms such as Meta/Facebook), which may set their own cookies subject to their own privacy policies. Cookies do not usually identify you personally but may be linked to information we hold about you. You can control or disable cookies through your browser or device settings, although some features of our website or app may not function properly if you do.

4. USE AND DISCLOSURE

4.1 The Club will generally use and disclose personal information for the primary purpose for which it was collected, for related purposes you would reasonably expect, with your consent, or where required or permitted by law. We may use

your personal information to communicate with you about your membership, renewals, services, facilities, events, promotions, loyalty program benefits, gaming machine-related matters and other Club activities. We will only use your personal information for direct marketing where permitted by the Privacy Act and any other applicable law. Where required, we will obtain your consent before sending marketing communications.

4.2 You may opt out of receiving direct marketing communications from us at any time by using the unsubscribe facility in the communication or by contacting us using the details in this policy.

4.3 We may use commercially available artificial intelligence (AI) tools and systems in the course of our operations, including but not limited to analytics, security, identity verification, self-exclusion management, harm minimisation, venue operations and administrative functions. Where we use AI tools that involve the handling of personal information, we will do so in accordance with the APPs. We will only use or disclose personal information in connection with an AI system for the primary purpose for which it was collected, or for a related secondary purpose that you would reasonably expect, with your consent, or where otherwise permitted by law. We do not enter sensitive information into publicly available AI tools unless strictly required by law and where appropriate safeguards are in place. In some cases we use, or arrange for, computer programs (including AI systems) to make a decision, or to do a thing that is substantially and directly related to making a decision, where that decision could reasonably be expected to significantly affect your rights or interests - for example, decisions relating to identity verification and customer due diligence, fraud detection, security and access control, and self-exclusion or venue exclusion and harm minimisation measures, including decisions that may affect your access to our venues, services or facilities. The kinds of personal information used in the operation of those programs may include your identity and verification details, membership and account details, transaction and activity history, images and biometric information, and information generated through your use of Club facilities and systems. We maintain human oversight of AI-assisted processes and do not rely solely on automated outputs in relation to decisions that may have a significant effect on individuals. Where AI is used in ways that may materially affect you, we will take reasonable steps to ensure that you are made aware of this and that the basis for any decision can be explained to the extent reasonably practicable. If you have questions about our use of AI, automated decision-making, and how it may affect the handling of your personal information, please contact our Privacy Officer.

4.4 Without limiting the above, the purposes for which the Club may collect, hold, use and disclose your personal information include, but are not limited to: verifying your age, identifying you and processing and administering your membership application and membership; complying with our obligations and meeting statutory requirements under the Registered Clubs Act 1976 (NSW), the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and associated rules and regulations, and other relevant legislation, including carrying out applicable customer identification and verification, ongoing customer due diligence, transaction monitoring, record-keeping, and the reporting of threshold transactions, suspicious matters and other reportable matters to AUSTRAC; contacting members to advertise and market events, activities, opportunities, offers and the goods and services provided by the Club (including by direct mail, email, telephone, SMS and MMS), including without limitation with respect to food and beverage, promotions, raffles, entertainment, wagering, gaming machines, gaming, and events and function facilities, in each case

subject to your right to opt out and to the direct marketing provisions described above and only to the extent permitted by law; providing you with the goods or services you are receiving or utilising and administering any benefits you become entitled to in relation to those goods or services; conducting our internal business and management processes, such as accounting and auditing; recruitment; customer service management; training and events; surveys and general research; business relationship management; and any other purpose that you would reasonably expect or to which you have consented, or as otherwise required or authorised by law.

4.5 The Club does not sell or trade your personal information to third parties for their own commercial use. We may disclose personal information to third parties where reasonably necessary for our functions and activities, including service providers that assist us with our operations, such as providers of cloud hosting, software, app and website support, booking systems, payment processing, analytics, marketing and communications, identity verification, politically exposed person (PEP) and sanctions screening, loyalty and rewards program administration, and security and technology support services. In particular, in order to meet our obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth), we may use and disclose your personal information to specialist third-party service providers to carry out customer identification and verification, know-your-customer (KYC) checks, and politically exposed person (PEP) and sanctions screening as part of our customer due diligence. Where we disclose personal information (including government-issued identification details such as driver's licence, proof of age or passport details) to those providers, we will disclose only the personal information reasonably necessary for the particular check, and not your full record. We may also disclose personal information to our professional advisers, insurers, auditors, regulators, law enforcement agencies and other persons where required or authorised by law.

4.6 When you sign up to our e-newsletter, create an account, join a membership, loyalty or rewards program, or enter a competition, we may collect the personal information reasonably necessary to administer that activity. Subject to applicable law, we may also use that information, together with your interaction history with us, to send you tailored communications, offers and promotions where you have consented or where we are otherwise permitted to do so.

4.7 We are also subject to a number of specific legal disclosure obligations. Under the Corporations Act, we are required to provide you with certain notices and documents - including meeting notices and annual financial reports, and members have statutory rights to elect how they wish to receive certain documents or, in some cases, not receive annual financial reporting documents. We are also required by law to make the Register of Members available for inspection. In addition, we may disclose your personal information to police or regulatory authorities where required or authorised by law, or where otherwise permitted under the Privacy Act, and to another registered club or relevant service provider where required or authorised in connection with amalgamations, exclusion arrangements, self-exclusion arrangements or harm minimisation measures. As a party to a local liquor accord, we may also receive personal information from, and disclose personal information to, other participating venues, licensees and accord parties in connection with banning notices and related exclusion measures under the Liquor Act 2007 (NSW), for the purpose of giving effect to the accord and minimising alcohol-related harm, as authorised by that Act.

4.8 As a registered club, we may in limited circumstances use or disclose your personal information for welfare or benevolent purposes where we reasonably consider it appropriate to do so, consistent with our harm minimisation and responsible gambling obligations and our duty of care to members and guests. This may include disclosing personal information to a family member, carer, guardian or other person who appears to have a genuine concern for your welfare or interests - for example, in connection with problem gambling support, self-exclusion or exclusion arrangements, or where we are concerned about your health, safety or wellbeing. We will only use or disclose personal information in this way to the extent permitted by the Privacy Act, including where you have consented, where you would reasonably expect us to do so, where it is necessary to lessen or prevent a serious threat to the life, health or safety of any individual, or where it is otherwise required or authorised by law.

4.9 While the Club seeks to store personal information in Australia where practicable, our service providers - including our cloud hosting, software, app and website support, payment processing, analytics, identity verification, know-your-customer (KYC), and politically exposed person (PEP) and sanctions screening providers may store or process personal information overseas. Before disclosing personal information to an overseas recipient, we will take steps that are reasonable and possible in the circumstances to ensure that the recipient does not breach the Australian Privacy Principles in relation to that information, except where an exception under APP 8 applies (for example, where you have consented to the disclosure after being informed that APP 8.1 will not apply, or where the disclosure is required or authorised by or under an Australian law or a court/tribunal order), or to understand how that company stores personal information we disclose.

5. VERIFICATION AND IDENTIFICATION

5.1 When you interact with us, we will sometimes need to identify you and verify your identity. This is commonly required for matters such as membership applications and administration, venue entry, gaming, gaming machines, payment processing, refunds, promotions, complaints, self-exclusion arrangements, and compliance with legal obligations. In almost all cases where the Club collects personal information, it would be impracticable to deal with individuals who do not identify themselves, and accordingly the option to remain anonymous or use a pseudonym is generally not offered. In some limited circumstances, you may deal with us anonymously or by using a pseudonym, for example when making a general enquiry that does not require us to identify you. However, this option will not be available where we are required or authorised by law to identify you, where identification documents are required before an application can be considered, or where it is impracticable for us to deal with you unless your identity is known. If you choose not to provide personal information that we reasonably require, we may be unable to process your membership application, provide you with particular services, benefits or transactions, or otherwise deal with you.

5.2 In some situations where you are dealing with us, you may have the opportunity to opt out of providing particular personal information, such as by not choosing to use a member or player or rewards card within the Club, in situations where we have not made that mandatory for compliance purposes or where we determine that the provision of particular information is not needed by us in the particular circumstances.

5.3 If you are a member, there are certain materials such as notices of meeting that we are obliged to send to you and while you continue as a member you cannot

opt out of those.

5.4 In accordance with the Club's obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and our AML/CTF Program, we may request additional personal information from you to verify your identity, conduct ongoing customer due diligence, or respond to suspicious or unusual activity. Where you are unable or unwilling to provide the requested information, we may restrict, suspend or terminate our dealings with you.

5.5 Most of our identity, customer due diligence and screening activities - including verifying your identity, conducting know-your-customer (KYC) checks, and carrying out politically exposed person (PEP) and sanctions screening - are routine, and we will be open with you about them. However, in limited circumstances the law restricts what we can tell you. For example, where we form a suspicion, report a matter to AUSTRAC, or are involved in an investigation, the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) may prohibit us from disclosing that information to you (commonly referred to as "tipping off"). In those circumstances we may be unable to notify you about how your personal information is being handled, to give you access to certain information, or to explain our reasons, to the extent necessary to comply with our legal obligations.

5.6 If we receive unsolicited personal information about you, we will assess whether we could have lawfully collected that information under the APPs. If not, we will destroy or de-identify it within a reasonable timeframe where lawful and reasonable to do so. We will not use or disclose unsolicited personal information unless satisfied it could have been lawfully collected in the first place.

5.7 Where we collect a government related identifier (such as a driver's licence, proof of age card or passport number) to verify your identity, we do not adopt that identifier as our own means of identifying you. We will only use or disclose a government related identifier where reasonably necessary to verify your identity, to fulfil our obligations to an agency or under an Australian law or court/tribunal order (including the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)), or where otherwise required or authorised by law or permitted under the APPs.

6. SECURITY OF PERSONAL INFORMATION

6.1 The Club uses a range of physical, technical and organisational measures to protect the personal information we hold. Personal information may be stored in paper files, on local systems, through hosted platforms and with cloud-based service providers. We implement security measures that are reasonable in the circumstances, including access controls, password protection, encryption where appropriate, staff training and other safeguards designed to protect personal information from misuse, interference, loss and unauthorised access, modification or disclosure.

6.2 We treat the protection of personal information as part of our broader governance and risk framework. Privacy considerations are integrated into our AML/CTF Program and our internal practices, procedures and systems, including through privacy risk assessments, privacy impact assessments for higher-risk activities (such as the use of biometric information), staff training, and periodic review of this policy. Our Privacy Officer works with relevant personnel to ensure that personal information collected and held for AML/CTF and other purposes is handled in accordance with the APPs.

6.3 Access to personal information is limited to personnel and service providers who reasonably require that access for their duties or the services they provide to us. Additional restrictions apply to sensitive information and biometric information, having regard to the nature and sensitivity of that information.

6.4 In the ordinary course of our operations, personal information may be accessed by our staff and, where reasonably necessary, certain contractors and service providers acting on our behalf. This may include using your name or membership details for operational purposes within our venues, such as when responding to an incident or making an in-venue announcement.

6.5 There may be occasions where we use or disclose personal information without your prior consent where required or authorised by law, or where we reasonably believe it is necessary to lessen or prevent a serious threat to the life, health or safety of any individual, or to public health or safety, as permitted by the Privacy Act.

6.6 While we take reasonable steps to protect the personal information we hold, we cannot guarantee the absolute security of any information stored in physical or digital form. Risks such as unauthorised access, unintended disclosure or accidental loss - including through hacking or ransomware - are inherent features of modern digital environments. We encourage you to take reasonable precautions to protect your own personal information.

6.7 We maintain a data breach response plan to guide our handling of actual or suspected data breaches. If we become aware of a data breach likely to result in serious harm, we will take prompt steps to contain and assess the breach, notify affected individuals where required, and comply with our obligations under the Notifiable Data Breaches scheme and applicable OAIC guidelines. Where notifying affected individuals would be inconsistent with the AML/CTF restrictions described in Section 5.5, we will apply the notification requirements only to the extent necessary to avoid that inconsistency (for example, by notifying the Office of the Australian Information Commissioner but not the affected individual).

6.8 Our website and app may contain links to third-party websites and services. We are not responsible for the privacy practices or content of those websites, which are not covered by this Privacy Policy. We encourage you to review the privacy policy of any third-party website before providing your personal information to it.

7. RIGHT OF ACCESS AND CORRECTION

7.1 The Club takes reasonable steps to ensure that personal information we hold is accurate, up to date and complete. We encourage you to notify us of any changes to your details. Under the APPs, you have the right to request access to personal information we hold about you and to request correction of that information. We may ask you to verify your identity before providing access or making a correction request, and we will respond within a reasonable period and, in any event, within 30 days of the request. A reasonable administrative fee may apply to cover the cost of locating, retrieving and providing access to your personal information, but we will not charge you for simply making a request. Where access cannot be provided, we will give written reasons to the extent required by law. We may also be unable to give you access, or to provide reasons for refusing access, in the circumstances described in Section 5.

7.2 In accordance with the Gaming Machines Regulation 2019 (NSW), you are

entitled to request a gaming machine player activity statement at any time, free of charge.

7.3 If you believe that personal information we hold about you is inaccurate, incomplete, out of date, irrelevant or misleading, you may request a correction by contacting us using the details provided in this policy. We will not charge you for making a correction request or for correcting the information. We will take steps to correct the information within a reasonable period and, in any event, within 30 days of the request, or such other period as agreed. If we have previously disclosed the information to another APP entity and you ask us to do so, we will take reasonable steps to notify that other entity of the correction, unless it is impracticable or unlawful to do so. If we are unable to correct the information or disagree that a correction is warranted, we will notify you in writing with our reasons. You may also request that a statement be attached to your record noting your belief that the information requires correction.

7.4 There are some circumstances in which we may decline a request for access or correction, as permitted by the APPs – for example, where giving access would be unlawful, would have an unreasonable impact on the privacy of others, where the request is frivolous or vexatious, where the information relates to anticipated or existing legal proceedings, or where refusal is otherwise required or authorised by law. Where we refuse access or correction, we will give you written reasons and information about how to complain, except to the extent it would be unreasonable or unlawful to do so (including in the circumstances described in Section 5.5). Where appropriate, we may give access through a mutually agreed intermediary.

7.5 You may ask us to delete or de-identify personal information we hold about you. We will consider any such request and, where reasonable and lawful, give effect to it. However, we may be unable to do so where we are required or authorised by law to retain the information (for example, under the Registered Clubs Act 1976 (NSW) or the AML/CTF Act 2006 (Cth)), or where the information remains reasonably necessary for a purpose described in this policy.

8. RETENTION OF PERSONAL INFORMATION

8.1 The Club retains personal information only for as long as it is reasonably necessary for the purposes for which it was collected, for related legitimate business purposes, and to comply with legal, regulatory, accounting, dispute resolution and record-keeping obligations. Retention periods may vary depending on the nature of the information, why it was collected, and any legal requirements that apply.

8.2 Because many of our records are aggregated and maintained on a continuous basis, it can be difficult to identify a precise time at which particular personal information ceases to be relevant. We do not, however, retain personal information indefinitely: where information is no longer reasonably necessary for any purpose for which it may be used or disclosed, and we are not required or authorised by law to retain it, we will take reasonable steps to destroy it or ensure that it is de-identified. However, to the extent of personal information that is obtained in connection with a register of guests who enter our premises where the register is required under the clubs legislation, and which information forms part of a register (which may include identification information such as driver's licence details), we will usually not maintain a particular register entry beyond three years after the date of the entry in the register except where we have a reasonable basis for anticipating that the particular register may still be needed

in evidence at some later time.

8.3 Where required by law to maintain registers or records, we will retain those records for at least the period prescribed by the applicable legislation. For example, under the Registered Clubs Act 1976 (NSW) and the Registered Clubs Regulation 2025 (NSW), certain register entries must be retained for at least 3 years, and certain AML/CTF records for at least 7 years. Where a record may be required for legal proceedings, investigations, insurance, complaints, or regulatory purposes, we may retain it for a longer period that is reasonably necessary in the circumstances. When personal information is no longer required and we are no longer required or authorised to retain it, we will take reasonable steps to destroy the information or ensure that it is de-identified.

8.4 Consistent with changes to the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) that commenced on 31 March 2026, we are not required to retain scanned copies or photocopies of full identification documents (such as copies of a driver's licence or passport) for record-keeping purposes. Where we collect such documents to verify your identity, we will generally retain only the minimum information we reasonably need (such as your name, date of birth, residential address, the document type and number, and the outcome of our verification), and we will take reasonable steps to destroy or de-identify copies of full identification documents once they are no longer needed. Copies of identification documents made before 31 March 2026 may be retained as AML/CTF records for up to 7 years after the end of the relevant business relationship or the date of the last relevant transaction, after which we will take reasonable steps to destroy or de-identify them**.** Where it is not practicable to destroy or de-identify such copies immediately, we will take reasonable steps to place them beyond use and will destroy or de-identify them as soon as practicable.

9. ENQUIRIES AND COMPLAINTS

9.1 If you have any general enquiry about this policy, wish to request access to or correction of your personal information, wish to make a privacy complaint, or have a question about the way the Club handles your personal information, please contact our Privacy Officer using the details set out at the end of this policy. Our Privacy Officer has day-to-day responsibility for administering this policy across all of the Club's activities and venues. You may request access to your personal information or a gaming machine player activity statement by contacting our Privacy Officer using the contact details set out below.

9.2 We may amend this policy from time to time. Where we make material changes, we will take reasonable steps to notify you, such as by posting a notice on our website or through the Club app. The most current version will be published on our website. Please contact our Privacy Officer if you wish to confirm the latest version.

9.3 If you believe that personal information we hold about you is inaccurate, incomplete, out of date, irrelevant or misleading, please refer to Section 7 of this policy for information on how to request a correction.

9.4 If you have a concern or complaint about the way the Club has handled your personal information, please contact our Privacy Officer in the first instance. We will acknowledge your complaint within 5 business days, consider and investigate it in accordance with our internal processes, and provide you with a written response within 30 days (or such longer period as may be reasonably required for complex complaints, in which case we will keep you informed of progress).

We may ask you to provide further information to help us investigate your complaint. If you are dissatisfied with our response, you may lodge a complaint with the Office of the Australian Information Commissioner at www.oaic.gov.au or by calling 1300 363 992.

9.5 Contact details for the Club's Privacy Officer are as follows:

Alison McKay
Milton Ulladulla Ex-Servos Club Limited
212-222 Princes Highway
ULLADULLA NSW 2539
Telephone: 02 4455 1444
Fax: 02 4454 0038
Email: enquiries@ulladullaexservos.com.au

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