

Doxa Community Club Inc

Privacy Policy

1. Introduction

At Doxa Community Club Inc (ABN 11 129 790 467) (Doxa), we are committed to protecting your privacy and handling your personal information in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs), and — where relevant to our anti-money laundering obligations as a ‘designated services provider’ (gambling services) — the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) (AML Obligations). As a Victorian venue operator, we are licensed by the Victorian Gambling and Casino Control Commission (VGCCC) who administers the Gambling Regulation Act 2003 (Vic), which permits Doxa to operate gaming machines.

This policy outlines the types of personal information we collect, why we collect it, how we use, store, secure and disclose it, and the rights you are entitled to view, change and remove this data as well as lodge an enquiry or complaint with us.

We also explain our use of Facial Recognition Technology (FRT) to enhance the safety and security of our members, guests and staff and comply with self-exclusion programs.

We review and update this policy regularly to make sure it reflects our current practices and legislative changes. Where we make material changes, we will update the "last updated" date and, where appropriate, notify members directly.

2. Application

This policy covers all Venues operated by Doxa, which include:

- Central Point, Ground Floor, 315 Elizabeth Street, Melbourne VIC 3000; and
 - Clocks at Flinders Street Station, Shop 17, Flinders Street Station, Melbourne VIC 3000
- (each hereafter known as a ‘Venue’).

3. What personal information we collect and why?

‘Personal information’ includes key details about a person such as name, date of birth, image, phone number, address and email address.

We collect only the personal information that is reasonably necessary to provide our services, operate a safe Venue, meet our legal obligations and manage the Doxa Rewards Loyalty Program.

The type of personal information we collect from or about you depends on your interaction with us and may include some or all of the following:

- Identity and contact details information, such as name, date of birth, residential address, phone number, email address. This may be requested at point of entry to our Venues by our staff and when signing in as a guest;
- Membership and loyalty information, such as membership number, Doxa Rewards activity, preferences and communication history;
- Financial and identification information ('Know Your Customer' under AML/CTF Obligations): for issuing of cheques and financial transfers, we may collect identification document details (for example driver's licence, passport, expiry dates and image information) and banking details for Electronic Funds Transfers;
- Ongoing customer due diligence used to prevent and detect fraud, including historical gaming transaction information, which might include re-verification of identification information, source of wealth/funds requests and third-party searches as part of our AML/CTF Obligations;
- Venue safety and surveillance information: CCTV footage and, at designated entry points, facial recognition technology (FRT) data, used only for the purposes described in section 6;
- YourPlay information: where you use a YourPlay card, information about your tracked gaming activity, in accordance with the YourPlay scheme; and
- Correspondence information: information you provide when contacting us for feedback, complaints, compliments, responses to market research, claims you have made, whether in person, on our website, via social media, telephone or email.

Our websites for Doxa and affiliates, such as Miss Gunn's and Betsy Jane Cafe, may use tracking technologies to understand website traffic and collect statistics such as how many people visit the websites, how they find them and use them. We may collect information such as your device type, browser information, IP address, approximate location and use of website navigation features. We use this information for website analytics and to improve the experience for our customers. We do not use this information to personally identify you.

We also collect your personal information where we are required or authorised to do so by an Australian law or court or tribunal order, for example, and in particular, pursuant to the Gambling Regulation Act 2003 (Vic) and our AML/CTF Obligations.

4. Sensitive information

'Sensitive information' is a subset of personal information that includes information or an opinion about an individual's racial or ethnic origin, political or trade union opinions or memberships, religious beliefs or affiliations, philosophical beliefs, sexual preferences, criminal record, health information, genetic or biometric information. This information is given a higher level of protection under the Privacy Act 1988 (Cth).

There are limited circumstances in which we might collect sensitive information:

- Information related to dietary requirements when ordering food or drink;

- In case of a medical emergency, to provide first-aid and engage emergency services; and
- Information collected by the FRT as is reasonably necessary and proportionate for self-exclusion compliance, safety and security of our patrons and staff, preventing underage persons from accessing gambling areas or services, and prevention of gambling harm as explained in section 6.

5. How we collect personal information

Wherever practicable, we collect personal information directly from you — for example, when you call us to make a restaurant booking, join Doxa Rewards loyalty program, register for self-exclusion, or collect winnings \$2,000 or more. Some information, such as images captured by CCTV and FRT cameras, is collected automatically when you enter our Venues.

For all correspondence to Doxa's members, including by direct email, mail and SMS, you will always be given the opportunity to opt-out of communications, except where the message is a 'designated commercial electronic message' as defined under the Spam Act 2003 (Cth).

Where relevant, we will also collect personal information (including sensitive information) about you from a publicly available source (such as other websites), as well as from law enforcement, government or regulatory bodies.

Appropriate signage has been placed in and around our Venues informing you of when we collect your personal information and how it is disclosed to authorised third parties.

6. FRT

6.1 Why we use FRT

Doxa uses FRT at designated points of our Venues to help us identify individuals who have been excluded from the Venues, such as through a self-exclusion program, in order to ensure the wellbeing, safety and security of our patrons and staff, and to support our responsible gambling obligations such as preventing underage persons from having access to gambling areas or services as per the Gambling Regulation Act 2003 (Vic).

Doxa identified FRT as the most suitable technology to assist its staff in better managing excluded individuals, and its benefits are proportionate to the privacy risks it could create such that a large portion of Victorian gaming Venues are now utilising this technology.

By entering a gaming area, you consent to having an image of your face recorded for these purposes. If you do not wish to be recorded or have your biometric data collected, Doxa will be unable to provide you some or all of its services.

6.2 How FRT works and how data is handled

- Cameras at designated points in the Venue capture a facial image and a biometric template (a numerical representation of facial features) for comparison against our excluded persons image databases and for age estimation;
- If no match is found and the age estimate provided by the system is above permitted age, the biometric template is automatically and permanently deleted, generally within seconds, while the image is retained for twenty-eight (28) days;
- If a possible match is found or the system estimates the age of the patron to be possibly underage, the biometric template is retained only for the short period needed for staff to conduct their manual review and assessment, after which it is deleted, while the image is retained for a minimum of twenty-eight (28) days. No biometric template data is retained long-term in the case of verified match or a false positive match;
- We may separately generate anonymised, aggregate statistics (for example, approximate crowd counts) from FRT systems to improve Venue operations and customer experience. This aggregate data cannot be used to reidentify any individual; and
- All FRT data is stored and processed securely onsite, with access restricted to authorised, trained staff only. No FRT data is stored off-site or in the cloud, and it is not integrated with unrelated systems, sold, or used to train external algorithms.

6.3 Databases

We reference three (3) excluded persons databases against which the FRT compares the biometric templates:

- Database of digital images of persons who voluntarily signed up for the EASE self-exclusion program with Community Clubs Victoria (CCV; see <https://www.ccv.net.au/i-want-to-self-exclude/>). This database is stored and administered entirely by CCV and is outside of Doxa's control;
- Database of digital images of persons who voluntarily signed up for the TABCare self-exclusion program (see https://tabinfo.com.au/TABCare_2025_Rebrand_Assets_TABCare_Program_Online.pdf) and nominated one or both Doxa's Venues for self-exclusion. This database is maintained on Doxa's premises and is administered based on communication we receive from TAB; and
- Database of digital images of persons who have previously been excluded from Doxa's Venues because of criminal and/or antisocial behaviours (or for other matters of a similar nature) and been issued a ban notice where it was practicable to do so. These images are obtained from in-venue CCTV. The database is administered by Doxa's General and Security Managers and reviewed based on the lengths of bans issued.

6.4 FRT supports Doxa staff

The FRT system at Doxa Venues does not make any automated decisions about whether a person is removed, refused entry, or otherwise excluded from our Venues. The system only generates an internal alert that prompts trained Doxa staff to conduct further assessment — which may include a discreet conversation with the individual to confirm their identity and circumstances — before any decision is made about their continued presence in the Venue.

6.5 Our compliance and your rights under the APPs

Our use of FRT is governed by the Privacy Act 1988 (Cth) and the APPs.

- We use FRT in line with the ‘permitted general situations’ set out in section 16A of the Privacy Act 1988 (Cth), where we reasonably believe collection is necessary to lessen or prevent a serious threat to safety of our patrons and staff, to address suspected unlawful activity or serious misconduct in relation to potential self-exclusion breaches, and to prevent underage persons from entering gaming areas or accessing gambling services as per the Gambling Regulation Act 2003 (Vic);
- The FRT technology is used as an adjunct to other methods of creating a safe environment in our Venues, such as CCTV cameras and the presence of the Responsible Gambling Officers and security staff;
- We display clear signage at Venue entry points to inform patrons of the use of FRT and direct patrons to this policy for more information; and
- We use secure methods to protect the data and information we collect, the access is restricted to authorised personnel only and it is destroyed as soon as practicable. The biometric template information is usually destroyed within seconds.

You have the right to:

- Request information about the data we collect;
- Request a change or raise a complaint if you believe that the data we hold is inaccurate (see section 10).
- Ask questions about FRT and how it operates; and
- Request more details about how anonymised data is used and managed.

For questions, requests and complaints regarding the self-exclusion programs, including the databases of self-excluded persons that Doxa’s FRT system checks, please contact the administrators of the self-exclusion programs:

- Community Clubs Victoria on (03) 8851 4900 or <https://www.ccv.net.au/contact-us/>
- TABCare on 1800 646 132 or TABCare@tabcorp.com.au

7. Disclosure of personal information

We do not disclose your personal information to third parties for marketing purposes without your consent.

We may disclose personal information to:

- Contracted service providers and agents who assist us in operating our Venues and systems, who are bound by confidentiality and privacy obligations consistent with the Privacy Act 1988 (Cth) and the APPs;
- Regulators and government bodies, including the VGCCC, AUSTRAC pertaining to AML Obligations and law enforcement, where required or authorised by law; and
- Other parties where required by law, a court order, at the request of law enforcement or to lessen or prevent a serious threat to health or safety of our patrons or staff.

We do not currently disclose personal information to overseas recipients.

8. How we store and protect your information

Your personal information is stored in secure electronic systems protected by restricted access controls, passwords, and firewalls. Physical and written records are secured in restricted locations and protected using coded locks.

Access to all personal information is limited to authorised personnel who require it to perform their role, and is subject to ongoing security review, audit logging and staff training.

9. How long we keep your information

We are obligated to retain all our gaming, financial and membership records for a period of at least three (3) years and, in some cases, for at least seven (7) years to meet our legal, financial and AML Obligations purposes.

FRT biometric templates are retained only for the short periods, as described in section 6.2, and are deleted automatically. Images and video footage collected by the FRT and CCTV cameras will be retained for a minimum of 28 days to meet our legal, security and AML Obligations purposes

You may request that we remove your personal details from our records at any time, subject to our ongoing legal retention obligations (see section 12 for contact details).

10. Access, correction and complaints

You have the right to:

- Request to see what personal information we hold about you;
- Ask us to correct information you believe is inaccurate, out of date or incomplete. Doxa will also periodically request its Members to update their details to ensure they are accurate; and
- Ask questions about our use of FRT and how it operates, and request further details about how any anonymised data is used.

We will meet your needs where practical and subject to our ongoing legal obligations.

To make a request or raise a concern, contact us using the details in section 12. We aim to respond to access, correction and complaint requests within thirty (30) days, subject to the exemptions contained in the Privacy Act 1988 (Cth), and a verification of your identity as the owner of the information. Where applicable, we will inform you in advance of any fees that we may reasonably charge to find and provide to you the information you have requested (for example, voice-to-text transcription fees). If you are not satisfied with our response, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC) at oaic.gov.au.

We may reasonably refuse access to your personal information on the following grounds as permitted by the Privacy Act 1988 (Cth):

- We reasonably believe that giving access to the information would pose a serious threat to life, health or safety of any individual or the general public;
- Giving access would unreasonably impact the privacy of another person;
- We reasonably believe the request for access is frivolous or vexatious;
- The information is related to a legal proceeding between Doxa and the individual;
- Giving access would reveal intentions of Doxa in relation to negotiations with the individual in such a way as to prejudice these negotiations;
- Giving access jeopardises Doxa's ability to take action on suspected unlawful activity or serious misconduct;
- Giving access would reveal evaluative information generated within Doxa as connected to a commercially sensitive decision-making process;
- Giving access would be unlawful or denying access is otherwise authorised under Australian law or court/tribunal order;
- Giving access would likely prejudice enforcement-related activities conducted by, or on behalf of, an enforcement body.

11. Cookies, tracking technologies and third-party links

We use cookies and similar technologies to understand how visitors use our websites and help improve them.

You can control or disable cookies through your web browser settings. Please note that disabling cookies may affect how some parts of the websites work.

We use third-party technologies such as Google Analytics and Microsoft Clarity to analyse the website traffic and website use. They may process information in accordance with their own privacy policies.

Our website may contain links to third-party websites. We are not responsible for the privacy practices of those sites. Some third parties may use cookies or similar tracking technologies when you interact with our website; you can manage cookie preferences through your browser settings.

12. Contact us

If you have questions or concerns about this policy or how we handle your personal information, contact us:

Phone: (03) 9046 8241

Email: info@doxaclub.com.au

In writing: Doxa Community Club Responsible Gambling Manager, Level 2, 315 Elizabeth Street Melbourne Vic 3000

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