



This Privacy Policy sets out **Club Whispers Pty Ltd A.C.N 160 887 481** (hereinafter referred to as “**the Company**”) a member of the Whispers Entertainment Group (hereinafter referred to as “**the Group**”), commitment to safeguard your personal information.

"We", "us" and "our", means **the Company** including all and any (if any) of its business divisions. For further information about our business divisions or those within **the Group**, please contact the Privacy Officer whose details appear below.

COMPLIANCE WITH PRIVACY LEGISLATION

This Privacy Policy describes the purposes for which we may collect, store, use and disclose your personal information. It generally applies whenever we receive personal information from you (directly or indirectly) when you purchase membership, use our products or services or when we do business with you.

This Privacy Policy describes how we will comply with our obligations under the Privacy Act 1988, including the Australian Privacy Principles where applicable (if at all).

COLLECTION OF PERSONAL INFORMATION

Personal information is generally defined as information or an opinion that can identify a person. This information could include information such as your name, postal or email address, date of birth, image and financial details.

The type of personal information that we may collect from you will depend on the dealings you may have with us. For example, we may require more information about you when you apply for membership (e.g. production of identification documents) than we may require to enable you to enter a club or purchase a product.

If it is reasonable or practical to do so, we collect your personal information from you directly when you use our products and services or enter into arrangements with us. Although unlikely and depending on the product or service that we provide to you, we may collect your personal information from third parties.

USE OF PERSONAL INFORMATION

Within the Group, a number of businesses operate which handle personal information.

The general purposes for which we may collect and hold your personal information (and share that information with related companies) are:

- to identify you;
- to provide you with the product or service that you have requested and any benefits you may subsequently become entitled to in relation to that product or service;
- to manage and administer a product or service to you on an ongoing basis;

- to protect your use of the product or service, and our ability to provide that product or service;
- to promote safety and security in our venues;
- to comply with any obligations(*if any*)that we may have under laws that apply to our business.

The Company may share the information collected from you with one or more of the other companies in **the Group**. For further information about the companies and business divisions which make up **the Group**, please contact the Privacy Officer whose details appear below.

We may also use the information we collect about you, including your use of our products and services, to keep you informed about our products and services where they are relevant to your continued use of those products and services or your preferences.

Information about the way and frequency with which you use our products and services may also be used by us for the purposes of quality control and to develop and improve the products and services that we are able to offer to you.

DISCLOSURE OF PERSONAL INFORMATION

We may disclose your personal information where we are required or authorised to do so by or under law or where the disclosure is reasonably necessary to enforce the law or for enforcement related activities conducted by, or on behalf of, an enforcement body. This may occur, for example, where a law enforcement authority requests information from us.

So that we can provide you with new and better products and services either directly or through another member of **the Group**, we may also disclose your personal information between companies and businesses within **the Group**.

In addition, there are circumstances in which we may disclose your personal information to another organisation for particular purposes that are important to help us to operate our business. These circumstances are described in detail below.

SHARING INFORMATION WITH OTHER ORGANISATIONS

We will not sell your personal information to organisations outside **the Group**.

We will generally only give another organisation access to your personal information when the other organisation is providing services to us that help us to operate our business or to provide a service to you.

We require these organisations to agree to our Privacy Policy, meet strict conditions on the use of personal information, and to comply with same in the use, storage and disclosure of your personal information.

Such organisations are those that assist us:

- to provide, manage or administer the products and services that we offer. This includes service providers (such as mail house providers, printers and advertising agencies), postal services, call centres, customer research agencies and our advisers;

- to maintain, review, and develop our business systems, procedures and infrastructure, including testing or upgrading our computer software;
- with reviews of our business operations and structure;
- to collect outstanding debts; and
- with developing and planning new products and services.

We may also share your personal information with another organisation in relation to potential or threatened legal proceedings or disputes (whether between you and that organisation or between us and that organisation), including for the purposes of gaining legal advice, or to take action which we consider appropriate in relation to suspected unlawful activity or serious misconduct, including investigating any such alleged activity. We may also share your personal information with an organisation where we have obtained your consent.

MARKETING

We may also collect and use your personal information so that we can promote and market our products and services, promotions and upcoming events to you (including by way of direct mail, email, telemarketing, SMS and MMS messages).

We send this information to keep you informed of our new products and services and special offers, but if you don't want us to do this, you can contact us at any time to let us know that you no longer want to receive this information.

Such marketing may be undertaken by one or more of the companies in **the Group** using your personal information.

SURVEILLANCE OF VENUES

Many of the areas within the venues operated by us and/or other members of **the Group** are subject to CCTV and in some cases audio surveillance for security reasons.

Details of suspected or actual illegal and undesirable activities may be shared with law enforcement bodies.

YOUR PRIVACY ON THE INTERNET

We take care to ensure that any personal information you give us on the internet through any of our websites is protected and secure. We use cookies to protect and ensure the security of information that you give to us on our web sites.

You should keep any passwords or access codes that you have confidential. They are used to control your access to our products and services and are important in helping us to maintain the security of your personal information and the integrity of our internet services.

We provide links to other websites. These linked websites are not under our control. We are not responsible for the conduct of organisations linked to our website. We suggest that you review the privacy policies of any linked sites that you may access from our website before disclosing your personal information on them.

SECURITY OF PERSONAL INFORMATION

We will take reasonable steps to protect your personal information and ensure it is accurate, up-to-date and, when that personal information is used or disclosed, relevant to the purpose for which the information is being used or disclosed. Your personal information is held on secure servers or in storage located in controlled environments. Our employees and service providers are required to maintain the confidentiality of any personal information held by us.

ACCESS TO AND CHANGING YOUR PERSONAL INFORMATION

You are welcome to ask for access to personal information that we hold about you. To do so, you can obtain a copy of the request for information form from our website and send the completed form (*along with a certified copy of your photo identification*) to us using the details below:-

Privacy Officer
PO Box 5234
Gold Coast MC Qld 9726

Please refer to the Legal Notices area of our website to access the Request of Information Form

A copy of your information will generally be made available to you within 30 days. However, if there are circumstances under the Privacy Act 1988 in which we are not required to give you access to personal information. We will endeavour to let you know if any exceptions apply to your request.

If we intend to charge you a fee for us to find the information you have requested, we will inform you of this cost before we provide the information to you.

If you find that your personal information is inaccurate or out-of-date, and is not information you can update yourself by logging onto one of our websites, please let us know in writing using the details below:-

Privacy Officer
PO Box 5234
Gold Coast MC Qld 9726

If you have a question or need to contact us in relation to privacy, please contact us using the details below:

Privacy Officer
PO Box 5234
Gold Coast MC Qld 9726

YOUR SENSITIVE INFORMATION

We do not generally collect personal information or an opinion about your racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, or criminal records, or health information.

If we do, we will only collect such information where we have obtained your consent, for example, if you apply for a job with us or another business within the Group.

SENDING INFORMATION OVERSEAS

We will only disclose personal information overseas:

- in circumstances where we have required the entity overseas to be bound by the Privacy Act 1988; or
- where we have obtained your consent to the transfer.

CHANGES IN THE FUTURE

We may change our Privacy Policy at any time and to notify you of this we will place an updated version of the statements on our websites or any one of them as the case may be.

ADDITIONAL INFORMATION ON PRIVACY

For more information about privacy issues and the protection of privacy, visit the Office of the Australian Information Commissioner's website at www.oaic.org.au.

COMPANY E-MAIL ADDRESSES

Electronic addresses that are published on our websites and stationary are for professional communications only and this is not an invitation to send unsolicited commercial e-mails that are not related to our business.

COMPLAINTS

Should you wish to lodge a privacy complaint, this can be made in writing to the

Privacy Officer
PO Box 5234
Gold Coast MC Qld 9726

Any privacy complaint will normally be assessed, reviewed and responded to within 30 days.

If necessary, the Privacy Officer can investigate the matter and advise you of any corrective or other action taken by us to address the matter.