

The Ville

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PRIVACY POLICY

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This Privacy Policy sets out Breakwater Island Limited's commitment to safeguard personal information.

"We", "us", "our", "The Ville Resort-Casino" and "Ardo" means Breakwater Island Limited, which includes The Ville Resort – Casino, Ardo and the Townsville Entertainment and Convention Centre.

Compliance with privacy legislation

This Privacy Policy describes the purposes for which we may collect, store, use and disclose personal information. It generally applies whenever we receive personal information (directly or indirectly) in the course of providing our products or services or when we do business.

This Privacy Policy describes how we will comply with our obligations under the Privacy Act 1988, including the Australian Privacy Principles.

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 name, postal or email address, date of birth, image and financial details.

The type of personal information that we may collect will depend on the dealings you may have with us. For example, we may require more information about you when you apply for a membership rewards card (e.g. production of identification documents, occupation, nationality etc) than we may require to enable you to enter a competition or check into a hotel.

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. Depending on the product or service that we provide to you, we may collect your personal information from third parties.

We also have obligations to collect personal information under various legislations such as Anti-Money Laundering and Counter-Terrorism Financing Act 2006 or the Casino Control Act 1982.

Use of 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 obtain a credit report or other information from a credit reporting agency or financial services provider to assess an application for a cheque cashing facility which may be extended or offered to you;
- to seek to prevent illegal or undesirable activities;
- to otherwise assist law enforcement; and
- to comply with any obligations that we may have under laws that apply to our business or to meet reasonable requests from regulatory bodies which regulate our business, such as preparing player activity statements and monitoring the responsible provision of gambling services in our casinos, including the exclusion of patrons from our casinos.

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 under the laws that apply to our business, for example, where a regulatory authority requests information from us. This includes, but not limited to obligations that we have under the following acts and associated legislative instruments:

- Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)
- Casino Control Act 1982 (Qld);

and in connection with our obligations relating to harm minimisation in gaming services. We may also disclose personal information where required or authorised by law to or, to meet a reasonable request from, a range of regulatory and other bodies, including the Australian Taxation Office, Australian Securities and Investments Commission, Centrelink, Child Support Agency and the Australian Financial Security Authority.

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 of Breakwater Island Limited.

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 the Australian Privacy Principles 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 but not limited to direct mail, telemarketing, SMS and MMS messages).

We will only send you this information if:

- you have indicated your consent to receiving such information; or
- such information is related to the purpose for which we originally collected your personal information.

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 at tsv.marketing@the-ville.com.au

Surveillance of venues

Breakwater Island Limited utilises CCTV, facial recognition and audio surveillance capabilities for security and other reasons.

We may collect, use and disclose personal information about you for security purposes, including:

- biometric information about you including your photograph or facial biometric information.
- collecting information from your driver's licence or other identification document/card when you enter our properties.
- collecting your car number plate details when you park in the car park of one of our properties.
- using information from your driver's licence or other identification document/card or from your car number plate details, to match with personal information we hold about you.

Facial images collected through CCTV surveillance, facial recognition cameras or from law enforcement bodies, and faceprints derived from those images, may be stored and compared for the above purposes detailed under Use of Personal Information. We may share these images and faceprint data amongst our related bodies corporate, with our facial recognition technology providers and with regulators and law enforcement bodies. By entering our premises, you consent to the collection and use of your personal information in these ways.

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

Verification of your identity

We may require evidence of your identity before fulfilling your request to access, correct or delete any of your personal information, gain access to gaming services or access to the property.

Identifying Excluded Persons

When you visit our premises we may collect, use and disclose personal information about you, including your facial biometric information, for the purpose of verifying whether you are an excluded person or a person whom we may otherwise lawfully deny access to the premises. We may also collect your image or facial biometric information from law enforcement bodies for this purpose.

If we identify such a person we may exclude or remove them from our premises in accordance with our policies and our legal and regulatory obligations.

Your privacy on the internet

We take care to ensure that any personal information you give us on the internet through one 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, please attend the relevant property from which you want to request the information and complete a request for information form, including your full name, address, account or membership number (if relevant), and signature. If you are unable to attend our properties to make a request, you can obtain a copy of the request for information form from the relevant property's website and send the completed form (along with a certified copy of your photo identification) to us using the details below.

Compliance Manager
Regulatory&Compliance@the-ville.com.au
The Ville Resort-Casino
PO Box 1223
Townsville
QLD 4810

A copy of your information will generally be made available to you within 30 days. However, there are circumstances under the Australian Privacy Principles in which we are not required to give you access to personal information. We will endeavour to let you know if one of these exceptions applies 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, please let us know.

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

Anonymity

You should advise us if you do not wish to be identified and wish to remain anonymous or use a pseudonym when entering into transactions with us. We will endeavour to assist with any such request:

- provided it is not impracticable to operate and communicate with you if you have not identified yourself in the circumstances; or
- except where we are required by law or an order from a court or tribunal requires us to only deal with you if you have identified yourself.

For example, anti-money laundering and counter-terrorism finance legislation may require you to be identified in order to be provided a service. In addition, to ensure safety and security on our premises and to comply with legislation relating to gaming and service of alcohol, you may be required to be identified.

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, sexual preferences or practices or criminal records, or health information.

If we do, we will only collect such information where:

- we are required to do so under a law that applies to our business, for example to comply with our obligations to maintain the security and integrity of our venues under the Casino Control Act 1982 (Qld); or
- we have obtained your consent.

Situations in which we may collect sensitive information from you include:

- if you apply for a job with us; or
- if you use our gambling venue, we may keep a record of criminal offences that you have committed, for example, where we are required to do this under laws that apply to our business.

Sending information overseas

For international patrons, we may share your personal information overseas with your nominated agents and/or representatives as the case may be. In addition, for international gaming patrons, we may share your personal information in order to conduct credit or other background checks, including with other casinos and credit rating and other international reporting agencies.

We may share your contact information with our customer research service providers in order for them to provide, manage, advise on or administer products and services that we offer to you.

Except as set out above, we will only disclose personal information overseas:

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

Changes in the future

We may change our Privacy Policy at any time. We will place an updated version of the statements on our property website at – <https://www.the-ville.com.au/>

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 <https://www.oaic.gov.au/>

Company e-mail addresses

Electronic addresses that are published on our websites 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 lodge a privacy complaint, this can be made in writing to the:

Compliance Manager
Regulatory&Compliance@the-ville.com.au
The Ville Resort-Casino
PO Box 1223
Townsville
QLD 4810

Any privacy complaint will normally be assessed, reviewed and responded to within 30 days. If necessary, the Compliance Manager can investigate the matter and advise of any corrective or other action taken by the business to address the matter.