



## Policy- Facial Recognition and Ethical Data Use

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| Author:                         | BDRSL- General Manager               |
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| Relevant Legislation/Authority: | Bazzani Scully Priddle Lawyers       |
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This policy is an incorporated supplementary policy of the Bendigo District RSL Privacy Policy, and encompasses venues operated by the Bendigo District RSL Sub Branch Inc. (Bendigo District RSL):

- Bendigo District RSL: 73-75 Havilah Rd, Bendigo, Vic 3550

At Bendigo District RSL, we are committed to protecting your privacy and handling data in an ethical and responsible manner. Along with the Privacy Policy, this policy provides detailed information about our facial recognition system and outlines how we use and safeguard your sensitive information. By accessing or using our services, you consent to the collection, storage, use, and disclosure of your information 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 and biometric information 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 matching biometric templates to banned and self excluded patrons registered in our authorised database. We do not retain information on individuals who are not part of our database, and non-matched data is deleted automatically and immediately. This ensures that the system operates within the boundaries of our authorised network and respects the privacy of those who are not registered.
- 1.3 Self-Exclusion and Responsible Gambling:** In collaboration with AHA Self Exclusion Program, we have implemented a self-exclusion mechanism. This mechanism requires us to identify and prevent the entry of self-excluded individuals into our premises. Leveraging off AHA Self Exclusion Program, we promote responsible gambling practices and provide support to individuals who choose to self-exclude. Facial recognition data is a necessary tool to ensure that self-excluded individuals do not bypass our staff to access restricted facilities. The Bendigo District RSL places great importance on the protection of this vulnerable cohort of individuals.
- 1.4 Banned Patrons:** Bendigo District RSL issues formal ban notices to individuals where practicable, ensuring clarity, transparency, and alignment with legal and ethical standards. Wherever possible, banned patrons are informed of the reason for banning and that a record of their banning has been placed with a high priority note in the system. Facial recognition systems are necessary to enforce these banning notices, and including to protect against staff or patrons whose safety may be at risk of banned patrons gaining entry to the Premises.

## 2. Data Retention and Destruction:

- 2.1 Image Expiration and Privacy:** We are committed to upholding ethical and best-practice data practices. Biometric templates are processed and held in temporary system memory for comparison against registered databases. NO permanent storage of non-matching data occurs, and non-matching data is deleted immediately.
- 2.2 Limited Access:** Access to your facial recognition data is strictly limited to authorised personnel who require it for legitimate purposes, such as system maintenance or compliance with legal obligations. We implement strict access controls and only permit authorised 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 authorised 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 or sensitive 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. Please note that the retention of CCTV images is distinct from use and retention of biometric information.

## 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 collection and use of your facial image and biometric information, please contact us using the information provided in this 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 General Manager via email [office@bendigorsl.com.au](mailto:office@bendigorsl.com.au) or (03) 5442 2950. Our General Manager 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.

We retain the right to amend this policy at our discretion and at any time. Any alterations will be disseminated by publishing the revised Privacy Policy.

