

## **Christchurch Casino**

### **Privacy Policy**

**Effective Date: 17 January 2025**

#### **Protecting your privacy**

Christchurch Casino is committed to protecting the personal information you entrust to us and ensuring its obligations under the Privacy Act 2020 are met.

As part of our commitment to remain open and transparent in the way we manage your personal information, this Privacy Policy explains the way in which we collect, hold, use, disclose and safeguard your personal information.

This Privacy Policy, which is based on, and should be read in conjunction with, the Information Privacy Principles contained in the Privacy Act 2020, sets out:

- The kinds of personal information we collect from you.
- How we collect and hold your personal information.
- Why we collect, hold, use and disclose your personal information.
- How you can access the personal information that we hold about you, and how you can correct that information if required; and
- Whether we are likely to disclose your personal information to any overseas recipients and, if so, the countries in which those recipients are likely to be located.

By accessing or using our services, you agree to the collection and use of your personal data in accordance with this Privacy Policy.

#### **What type of personal information do we collect and hold?**

The type of personal information we collect, and hold varies depending on the kind of dealings we have with you. Below are some examples of the types of personal information that we will collect from you in certain situations.

## Players Club Membership

When you sign up to our Players Club Programme, we will ask you to provide us with personal information such as your name, date of birth, residential address, email address, phone number and other contact details. We will also take a copy of a form of identification such as your current driver's license, or passport.

Once you are a member of the Players Club Programme, we will also collect and hold information regarding your activities when you visit us, including your expenditure, how often you visit, what form of gaming you engage in, your cash or credit buy-ins, front money transactions, and electronic funds transferred. We collect this information to better monitor your gaming activities and offer you products and services that are tailored to your specific needs. The information collected is based on the use of your Players Club membership card.<sup>1</sup>

### How do we collect your personal information?

Your personal information is collected by us in a variety of ways. In most cases, and whenever possible, we will try to collect any personal information directly from you. However, in some circumstances, we may collect your personal information from third parties that you have authorised to provide such information to us, or that are required to provide such information in accordance with the law.

Some of the ways in which we collect personal information about you is when you:

- Visit our premises.
- Sign up to our Players Club Programme.
- Activate the Secure Electronic Transfer (SET) Cashless mechanism on your Players Club account.
- Register to receive our newsletters or other marketing material.
- Enter into our competitions or promotions.
- Visit our website.
- Make a restaurant, event, or meeting booking.
- Register to play Poker.
- Apply for a job with us.

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<sup>1</sup> The information we hold in respect of your play is as a result of a manual collection process on table games or automated process for gaming machines. It is only able to be collected when the Players Club Card is presented, or the guest recognised on table games or when the card is correctly inserted into any of our gaming machines. It should therefore not be relied on as being completely accurate in all respects.

- Conduct a transaction which requires us to obtain personal information for the purposes of complying with anti-money laundering and counter-terrorism financing laws.
- Complete one of our surveys; or
- Otherwise interact with us.

In certain circumstances, we will also collect your personal information from third parties, including:

- Booking agents who consult with us to make bookings for goods, services, and facilities on your behalf.
- Third parties that run competitions and other promotions for which we may be a sponsor or participant.
- Third parties that provide services from within our premises.
- Third parties that purchase a Christchurch Casino gift voucher for you.
- Third parties that provide us with marketing databases into which you have opted.
- Regulatory authorities.
- Google analytics.
- Social media databases (including Facebook, Twitter, LinkedIn, and Instagram).
- Recruitment agencies and/or recruitment software providers through whom you have applied for a role with Christchurch Casino.
- Organisations including the Companies Office, Insolvency Office, and any other organisations we deem relevant.

We may also collect personal information from you via your computer through the use of cookies. Cookies are small data files which identify your computer after it visits a website for the first time. The information collected can include your internet protocol (IP) address, domain name, internet service provider and general online behaviour (such as the content, images, and advertisements you select). Your internet browser will have an option to disable cookies, however doing so may limit the experience and services we are able to offer you.

### **How do we hold your personal information?**

Your personal information is securely stored in our on-site databases, in proprietary data format, which can only be read using proprietary tools, and through cloud-based storage, some of which is managed by our external service providers. These providers have stringent security measures in place to protect your data, and we take appropriate steps to ensure that your information is managed appropriately, in accordance with the Privacy Act. We employ

industry best practice standards to protect your personal information from unauthorised access or use.

Only certain authorised staff can access your personal information, and the level of access is role dependent. These staff members (as well as our external providers) are required to maintain the confidentiality of your personal information at all times, as a condition of employment. Direct access to the databases is restricted to ensure your data remains secure and protected and we use all reasonable means to protect your personal information securely against unauthorised use and access. Authorised employees are also required to use secure logins and passwords when accessing Christchurch Casino systems.

In the unlikely event of a privacy breach that we believe has caused serious harm to an affected individual or individuals or is likely to do so, we will contact you. We will also advise the Office of the Privacy Commissioner at this time.

#### **For what purpose do we collect, hold, use, and disclose your personal information?**

The purpose for which we collect, hold, use and disclose your personal information depends on how and why that information was originally gathered by us from you. We will not collect, hold, use or disclose your personal information other than for the purpose for which it was collected, for a purpose which is reasonably apparent at the time we collect it or as otherwise required or specifically permitted by law.

#### **Ways your personal information may be collected, held, used, or disclosed**

Your personal information may be collected, held, used, or disclosed for various purposes, including the following:

##### **Anti-Money Laundering and Countering Financing of Terrorism Gambling Act 2003**

As a casino operator, we are subject to the Anti-Money Laundering and Countering Financing of Terrorism Act 2009 (the AML/CFT Act). This places a legal obligation on us to know our customers and means that, on occasion, we may seek personal information from you such as information about your financial circumstances and/or the source(s) of your funds and/or wealth, in accordance with our Customer Due Diligence processes and procedures. This information is gathered to ensure that we know our customers and can meet our regulatory obligations under the AML/CFT Act.

Christchurch Casino retains personal information and details of incidents and activities that may have or could lead to an exclusion order under the Gambling Act 2003 or other form of prohibition from our venue. We are also required to maintain records of certain transactions for AML/CFT purposes and/or other legal requirements.

## **Video Surveillance and Facial Recognition**

### *General*

For regulatory and security reasons, we have a number of surveillance and facial recognition cameras active throughout our venue. This is stated on signage located at our main entrance and entrances to the main casino foyer on the ground floor.

Facial recognition cameras are also active at Automatic Teller Machines (ATMs), and surveillance cameras monitor and record activity both in and around the surrounding areas of our premises. In certain circumstances, we will retain surveillance (including body cameras) and facial recognition footage, which may include image, audio, and video recordings of you. Retained surveillance and facial recognition footage may be supplied to Christchurch Casino's regulators and/or government agencies where required and/or permitted by law. Where not required for compliance with any applicable legislation or regulation, footage captured by our surveillance and facial recognition cameras will be deleted within a reasonable timeframe after collection.

Christchurch Casino may use photographs of patrons (either provided by patrons to Christchurch Casino or collected by Christchurch Casino) for the purposes of identifying patrons who may be at risk of gambling related harm as is required by our Host Responsibility Programme, who are subject to an exclusion or banning order, or for other purposes properly related to the maintenance of security and safety at our premises, including uploading photographs into Christchurch Casino's facial recognition system. All images and footage are securely processed and stored in compliance with the Privacy Act 2020 (the Privacy Act).

### *ATM Transactions*

Christchurch Casino also monitors repeat visits to ATMs located on its premises for indicators of problem gambling which, when triggered, a facial recognition image is subsequently taken for identification purposes. No patron card or bank account details are captured as part of this process and any facial recognition images which are not matched to potential problem gambling behaviours are not stored in the casino's security and risk management system.

### **Restaurant/Event/Meeting Bookings**

When you make a reservation at one of our restaurants or events, we will ask you to provide us with personal information, including your name and contact details (such as your mobile number and email address). This information is collected and held by us so that we can identify you and contact you if required.

### **The Provision of Goods or Services**

We will often use your personal information when providing you with specific goods or services. This may be to verify your identity following certain requests (such as confirming a restaurant booking or processing a payment) as well as offering you other support services. In some situations, your information may be disclosed to our contractors and service providers, but only to the extent necessary to operate our business or provide you with the product or service you have requested.

Where your personal information (including your name, address, and phone number) has been collected from a third party for the purpose of providing you a gift voucher, your personal information will be used solely for the purpose of issuing the gift voucher and providing the product and/or services redeemable under the gift voucher.

From time to time we may disclose personal information to our service providers and affiliates where they are retained to perform functions on our behalf, provided such service providers and affiliates have entered into written agreements with us and do not collect, use or disclose the personal information for any purpose other than to perform such functions on our behalf, to provide services to us, or as otherwise required by law.

### **Marketing**

In certain circumstances, the personal information we collect from you will be used in our marketing campaigns and for the purposes of marketing our business. This includes, but is not limited to, sending you tailored newsletters, promotions, and updates that you have opted to receive via post, email, application (app) communications or mobile device. Any marketing material sent by us to you will include the ability for you to opt-out of receiving any future marketing material if you choose to do so.

Christchurch Casino may also use a range of services offered by third parties such as Facebook and Google to generate reports on visitation data and other marketing trends which will help us deliver you tailored internet-based advertisements that are better suited to your interests.

### **Competitions**

Your personal details will be collected and held by us when you participate in any promotions or competitions that we hold. These details are required both for identification purposes, so that you can claim your prize, and so that we can contact you in the event that you have won a prize. If you have opted out of receiving marketing or promotional material, but have won a prize in a competition, we will still contact you.

### **Law Enforcement and Regulatory Organisations**

As a casino operator, some of our activities are monitored by law enforcement and regulatory bodies, including, but not limited to, the Department of Internal Affairs, Gambling Commission, Inland Revenue Department and Police. Your personal information may be collected, held, and disclosed by us to such organisations as required or authorised by law.

Your information will be disclosed to other New Zealand casinos if you have been excluded from the premises.

Your information may also be disclosed to other New Zealand casinos for the purposes of conducting verifications and any other relevant checks required.

### **Players Club**

Your Players Club membership details may be used for marketing products, services and promotions which may appeal to you or for which you may qualify. In addition, if you are a Players Club member, we may use details of your gaming activities to assess eligibility for each tier of the Programme, award rewards, determine your eligibility for certain member exclusive promotions and provide you with any other benefits to which you may be eligible.

In addition, your gaming activity will also be used to help us identify any indicators of potential problem gambling and, where relevant, allows us to notify you when you are approaching, or have exceeded, any limits you have set for yourself while gaming.

## **How can you access and, if necessary, change or correct your personal information?**

Under the Privacy Act, you have a right to seek access to information which Christchurch Casino holds about you. You also have the right to ask us to correct information about you, which is inaccurate, incomplete, or out of date.

Player Expenditure Records can be requested by sending a request to the Casino via the Compliance Team. This can be facilitated to staff who will communicate with the Compliance Team, or the request can be sent directly to [privacy@christchurchcasino.co.nz](mailto:privacy@christchurchcasino.co.nz).

If you are a Players Club member and wish to access details of your membership, you can also visit a Players Club desk onsite. For all other requests for personal information, please email [privacy@christchurchcasino.co.nz](mailto:privacy@christchurchcasino.co.nz) with details of the personal information required. In accordance with the Privacy Act, we will provide you with access to your personal information within 20 working days, and you will have the opportunity to correct or update that information if needed.

If we are unable to provide you with access to your personal information, we will explain the reason for this. If you are not satisfied with our response to any request for details of your personal information, you may contact our Privacy Officer at the email address above.

## **Are we likely to disclose your personal information to overseas recipients?**

We may disclose your personal information to other organisations overseas, but only for specific purposes. These purposes may include identity and credit checks, bookings, personal requests by you, and for any competitions or promotions you may have won. We may also disclose your personal information to overseas entities that assist us in the provision of our services. These entities may be located in the United States of America, Australia, and Canada.

We also disclose information to ChristchurchCasino.com, to ensure that any members who are banned from Christchurch Casino, will also be treated in the same manner by ChristchurchCasino.com. The ChristchurchCasino.com company is registered in accordance with Maltese law.

We take all reasonable steps to ensure that any overseas recipients do not breach any of the obligations imposed under the Information Privacy Principles in relation to the personal information we disclose to them.



## Online privacy issues

To the extent that this Privacy Policy applies to online privacy issues, it is to be read as forming part of the Terms of Use for our website, which you can find [here](#).

## Contact us

If you have any questions or concerns about this Privacy Policy, the way we manage your personal information, or if you feel that Christchurch Casinos is not complying with the policy, please contact our Privacy Officer using the following contact details:

Email: [privacy@christchurchcasino.co.nz](mailto:privacy@christchurchcasino.co.nz)

Phone: +64 3 371 2453

Letter to: P.O. Box 4141, Christchurch 8140

## Further information

For more information about privacy issues and the protection of privacy, visit the Office of the Privacy Commissioner's website at [www.privacy.org.nz](http://www.privacy.org.nz).

A copy of the Privacy Act 2020 and the Information Privacy Principles can be accessed [here](#).

For more information about how Google Analytics works please click [here](#).

For more information about our Players Club Programme please visit our website:

- <https://christchurchcasino.co.nz/players-club/>
- <https://christchurchcasino.co.nz/wp-content/uploads/2019/04/Players-Club-Terms-and-Conditions.pdf>

## Changes to this Privacy Policy

We reserve the right to vary this Privacy Policy at any time. All changes will be notified by posting an updated version of the Privacy Policy on our website, with an updated effective date. Please check our website regularly to stay up to date on any changes made.

Last updated: 17 January 2025