

Privacy Collection Statement (FRT)



FACIAL RECOGNITION TECHNOLOGY (FRT)

Summary

This Privacy Collection Statement explains how C.ex Group uses Facial Recognition Technology (FRT) to support venue safety and meet legal and regulatory obligations. Where C.ex Group uses FRT to identify patrons who have self-excluded (or are otherwise excluded) from the venue or gaming areas as part of gambling harm minimisation, C.ex Group also has regard to the **Code of Practice: Facial Recognition Technology in Hotels and Clubs** issued by **Liquor & Gaming NSW** (16 March 2026). The Code is a **voluntary advisory** document (compliance is encouraged) and does not replace C.ex Group's mandatory obligations under the **Privacy Act 1988 (Cth)** and other relevant laws.

Purpose of collection

C.ex Group uses Facial Recognition Technology (FRT) to support its legitimate interests in maintaining a safe and secure environment for patrons, staff and the broader community. Where used, FRT may also be used to support gambling harm minimisation by helping identify patrons who have self-excluded (or are otherwise excluded) from entry to the venue or specific areas, in line with applicable club and liquor and gaming laws and arrangements such as multi-venue barring (MVB).

- Meeting legal and regulatory obligations, including mandatory and voluntary exclusions, barring and membership-related conditions under applicable registered club and liquor and gaming laws.
- Supporting responsible gambling initiatives and harm-minimisation strategies.
- Supporting compliance with internal policies and procedures.
- Supporting the Coffs Harbour Liquor Accord multi-venue barring (MVB) agreement.

C.ex Group does not use FRT for marketing, advertising, behavioural profiling, or commercial purposes. The Liquor & Gaming NSW Code of Practice is intended to apply to the use of FRT in hotels and clubs with gaming machines for exclusion (including self-exclusion) purposes. It does not apply to FRT used for anti-money laundering purposes or for other non-exclusion purposes. If C.ex Group uses FRT for any other purpose, it will be governed and assessed separately to ensure it complies with applicable privacy and other legal obligations.

Types of personal information collected

Depending on the context, the following types of personal information may be collected:

Facial Recognition Technology (FRT)

- Facial images and biometric templates (a mathematical representation of facial features). Biometric templates are generally treated as **sensitive information** under the Privacy Act 1988 (Cth).

How we collect your information

- **FRT** captures facial images via CCTV cameras used for FRT, located at entry points and within designated areas of our venues.

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Legal basis for collection

C.ex Group collects and uses your personal and sensitive information in accordance with the:

- **Privacy Act 1988 (Cth)** and the **Australian Privacy Principles (APPs)**.
- **Code of Practice: Facial Recognition Technology in Hotels and Clubs** (Liquor & Gaming NSW, 16 March 2026) – a **voluntary advisory** document (compliance is encouraged), including guidance on privacy risk identification, signage, data storage, access and use, system performance and integrity, and staff responses to positive matches.
- Other applicable laws and regulatory obligations.

Consent and notice

C.ex Group provides clear notice of FRT through prominent signage and Conditions of Entry. Where C.ex Group relies on consent for collection (for example, in circumstances where consent is required), C.ex Group seeks to ensure consent is **informed and voluntary**, supported by that notice. In some cases, collection may be authorised or required by law and consent is not required. Signage is displayed in accordance with the Code of Practice (where applicable).

Use and disclosure of information

Your personal information may be used or disclosed for the purposes outlined above. This includes:

- Internal use by authorised personnel (for example, Security, Compliance and Legal).
- Disclosure to law enforcement, regulators, or legal representatives where required or authorised by law.

C.ex Group does not sell or share your personal information for commercial gain.

Privacy governance

Where applicable, C.ex Group maintains a privacy impact assessment and data breach response plan in relation to its use of FRT, consistent with the **voluntary advisory** Code of Practice: Facial Recognition Technology in Hotels and Clubs (Liquor & Gaming NSW, 16 March 2026).

Data storage and retention

FRT data is stored securely on C.ex Group IT systems located in Australia, including on C.ex Group's private network. C.ex Group takes reasonable steps to ensure FRT data is handled in accordance with the **Privacy Act 1988 (Cth)** and is retained only for as long as necessary for the purposes described in this statement (and, where applicable, consistent with the Code of Practice and any other legal requirements). When no longer required, information is securely deleted or de-identified in accordance with C.ex Group's record management and security practices.

Security of your information

Security measures

C.ex Group implements robust security measures to protect your personal information (in line with the Code of Practice where applicable), including:

- Role-based access controls.
- Secure physical and digital storage environments.

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- Regular audits and system reviews.
- Staff training on privacy obligations, the appropriate use of FRT and data breach response.

Your rights

Access, correction and complaints

You have the right to:

- Request access to personal information held about you.
- Request correction of inaccurate or out-of-date information.
- Make a complaint about how your personal information has been handled.

To exercise these rights, please contact our Privacy Officer using the details below.

Transparency and notification

C.ex Group provides notice of facial recognition through:

- Prominent signage at all entry points and monitored areas.
- Conditions of Entry and the C.ex Group Privacy Policy.

Where C.ex Group relies on consent for collection (for example, in circumstances where consent is required), that consent is sought through the information provided in signage and Conditions of Entry. C.ex Group does not rely on consent where collection is authorised or required by law.

Contact us

For more information, to access your personal information, or to make a privacy complaint, please contact:

Compliance Officer

C.ex Group
PO Box 2068
Coffs Harbour NSW 2450
Email: info@cex.com.au
Privacy Policy: [C.ex Group Privacy Policy](#)

Administration

Policy owner

This policy is owned by the Compliance Officer (Policy Owner).

The Policy Owner is authorised under this policy to make minor changes to content without the approval of the Policy Approver where those changes relate to position titles, minor spelling or grammatical corrections, or updates to appendices.

The Policy Owner is responsible for conducting a full review of this policy at least every two years.

- Document created: May 2026.
- Document approved: May 2026.

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Policy approver

Approval of this policy is the responsibility of the Board of Directors (Policy Approver) of the Coffs Harbour Ex Services Memorial & Sporting Club.

Download a Privacy Request Form [here](#).