



Club Savoy Gaming Privacy Policy

Effective date: 01 February 2026

Club Savoy: ABN 38 685 685 403 of 252-254 Myrtle St, Myrtleford, Victoria 3737 is a venue operator licensed in Victoria. We are regulated by the Victorian Gambling and Casino Control Commission (VGCCC) for gambling operations and by AUSTRAC for anti-money laundering and counter-terrorism financing (AML/CTF). [\[vgccc.vic.gov.au\]](http://vgccc.vic.gov.au), [\[vgccc.vic.gov.au\]](http://vgccc.vic.gov.au), [\[austrac.gov.au\]](http://austrac.gov.au)

We handle personal information in accordance with the Privacy Act 1988 and the Australian Privacy Principles (APPs). Where we provide “designated services” (e.g., operating EGMs and paying winnings), our AML/CTF obligations also require certain information handling, record keeping and reporting to AUSTRAC. [\[oaic.gov.au\]](http://oaic.gov.au), [\[austrac.gov.au\]](http://austrac.gov.au)

1) What this policy covers

This policy explains how we collect, use, disclose and secure personal information across our gaming floor and related services, including:

- EGM play and payouts (including cash redemption terminals and manual payouts)
- Customer identification (KYC/CDD) required by AML/CTF laws
- Incident logs, suspicious activity monitoring and AML/CTF reporting
- CCTV across public areas of the venue
- Loyalty and pre-commitment programs (if applicable)
- Functions/food & beverage bookings and general enquiries. [\[austrac.gov.au\]](http://austrac.gov.au), [\[vgccc.vic.gov.au\]](http://vgccc.vic.gov.au)

2) The kinds of personal information we collect

Depending on your interactions with us, we may collect:

- Identity and contact details: name, date of birth, photo ID details (e.g., driver licence), address, phone, email. (Required for AML/CTF customer due diligence where applicable.) [\[homeaffairs.gov.au\]](http://homeaffairs.gov.au)
- Gaming interactions: EGM session/payout details, ticket or credit redemption data, loyalty/pre-commitment account identifiers, and (if relevant) visitor card/cashless gaming IDs. [\[austrac.gov.au\]](http://austrac.gov.au), [\[austrac.gov.au\]](http://austrac.gov.au)

- AML/CTF risk information: risk indicators, source of funds information (where relevant), politically exposed person (PEP) status checks, and internal suspicious matter indicators. [\[austrac.gov.au\]](#), [\[austrac.gov.au\]](#)
- CCTV footage in public areas for security, compliance and incident investigation. [\[vgccc.vic.gov.au\]](#)
- Operational information: incident reports, exclusion registers where applicable, responsible gambling interactions, and complaints. [\[vgccc.vic.gov.au\]](#)

Where lawful and necessary, we may collect information from third parties (e.g., your authorised representative, law enforcement, AUSTRAC queries/notices, or our gaming system providers). [\[austrac.gov.au\]](#)

3) Why we collect your information (purposes)

We collect, use and disclose personal information to:

- Comply with AML/CTF laws, including customer due diligence (CDD), ongoing monitoring, record-keeping, and reporting (e.g., Suspicious Matter Reports (SMRs) and Threshold Transaction Reports (TTRs) where required). [\[austrac.gov.au\]](#), [\[austrac.gov.au\]](#)
- Operate and manage gaming services lawfully and responsibly in Victoria (e.g., processing payouts, managing loyalty/pre-commitment, handling incidents, enforcing exclusions and venue rules). [\[vgccc.vic.gov.au\]](#)
- Security and safety, including theft and fraud prevention and incident investigation using CCTV and system logs. [\[vgccc.vic.gov.au\]](#)
- Respond to regulators and law enforcement, including AUSTRAC and VGCCC, when legally required. [\[austrac.gov.au\]](#), [\[vgccc.vic.gov.au\]](#)
- General venue operations, such as reservations, events, and responding to enquiries or complaints. These uses align with the APPs. [\[oaic.gov.au\]](#)

4) AML/CTF-specific obligations and how they affect privacy

As a reporting entity, our AML/CTF obligations include:

- Customer Due Diligence (CDD): We must identify and verify customers in certain situations and understand ML/TF risk; we may also conduct enhanced CDD (e.g., for higher-risk situations or PEPs). [\[homeaffairs.gov.au\]](#), [\[austrac.gov.au\]](#)

- Monitoring and reporting: We must monitor for and report suspicious matters (SMRs) to AUSTRAC and may need to submit TTRs for certain cash thresholds, in line with AUSTRAC's pubs & clubs guidance. [\[austrac.gov.au\]](#)
- Record keeping: We must keep certain KYC, transaction and program records for 7 years in an auditable form and store them securely. [\[austrac.gov.au\]](#)
- Tipping-off prohibition: It is a criminal offence for us to disclose information that would or could reasonably be expected to prejudice an investigation—for example, telling someone that an SMR was lodged about them. Do not ask staff if a report has been made; they are legally prohibited from discussing it. [\[austrac.gov.au\]](#), [\[www5.austlii.edu.au\]](#)

We handle AML/CTF information strictly on a need-to-know basis and maintain access controls, training and audit trails consistent with AUSTRAC guidance. [\[austrac.gov.au\]](#)

5) Legal basis for handling personal information

- We handle personal information where it is required or authorised by law (e.g., AML/CTF Act and Rules; Gambling Regulation Act 2003 (Vic)). [\[austrac.gov.au\]](#), [\[vgccc.vic.gov.au\]](#)
- We handle personal information to carry out our functions and activities as a venue in a way that is consistent with the APPs (e.g., providing services, safety and security, responding to enquiries). [\[oaic.gov.au\]](#)

6) How we collect information

- Directly from you (e.g., when verifying ID before certain payouts, during responsible gambling interactions, or when you sign up for loyalty/pre-commitment). [\[austrac.gov.au\]](#)
- Automatically via systems such as EGMs, payout and redemption systems, and CCTV. [\[vgccc.vic.gov.au\]](#)
- From third parties as required or permitted by law (e.g., AUSTRAC notices, law enforcement, or our service providers supporting our gaming systems). [\[austrac.gov.au\]](#)

7) Disclosures (who we share information with)

We may disclose personal information to:

- AUSTRAC to meet AML/CTF reporting and information-request obligations (e.g., SMRs/TTRs, responses to notices). [\[austrac.gov.au\]](#)
- VGCCC or other regulators and law enforcement agencies, where required or authorised by law. [\[vgccc.vic.gov.au\]](#), [\[vgccc.vic.gov.au\]](#)
- Trusted service providers (e.g., EGM monitoring providers, loyalty platform vendors, secure cloud or data-centre providers, AML screening tools) under contract, with confidentiality and security obligations. [\[austrac.gov.au\]](#)
- Professional advisers (legal, audit) for compliance and assurance purposes. (We ensure compliance with APPs and the tipping-off offence.) [\[oaic.gov.au\]](#), [\[austrac.gov.au\]](#)

We do not sell personal information. Cross-border disclosures (if any) will be assessed and managed under APP 8 obligations. [\[oaic.gov.au\]](#)

8) Data security

We take reasonable steps to protect personal information from misuse, interference, loss, and unauthorised access, modification or disclosure, including role-based access, encryption at rest/in transit where appropriate, physical security, staff training, and regular reviews. These controls reflect AUSTRAC record-keeping guidance and the APPs. [\[austrac.gov.au\]](#), [\[oaic.gov.au\]](#)

9) Data retention

We retain AML/CTF records (including identification, transactions and relevant program records) for at least 7 years, in line with AUSTRAC guidance. Other records are retained only as long as necessary for our functions, legal requirements or dispute resolution, then securely destroyed or de-identified. [\[austrac.gov.au\]](#)

10) Your rights (access and correction)

You can request access to or correction of your personal information we hold, subject to legal exceptions (e.g., where disclosure is restricted to avoid tipping-off or prejudicing investigations). We will respond within a reasonable time. Requests can be made via the contact details below. [\[oaic.gov.au\]](#), [\[austrac.gov.au\]](#)

11) CCTV

Our venue uses CCTV in public areas for safety, security, loss prevention and compliance purposes. We retain footage for a limited period unless needed for an incident, investigation or legal requirement. Access to footage is restricted and may be provided to law enforcement or regulators where authorised by law. [\[vgccc.vic.gov.au\]](https://vgccc.vic.gov.au)

12) Politically Exposed Persons (PEPs)

Under AML/CTF laws, we may assess whether a customer (or beneficial owner) is a PEP (domestic, foreign or international organisation PEP). Foreign PEPs must be treated as higher risk and may require enhanced CDD. Being a PEP does not imply wrongdoing; it reflects an elevated corruption/ML risk profile. [\[austrac.gov.au\]](https://austrac.gov.au)

13) Notifiable Data Breaches

If a data breach is likely to result in serious harm, we will assess and notify affected individuals and the OAIC as required by the Notifiable Data Breaches scheme under the Privacy Act. [\[ag.gov.au\]](https://ag.gov.au)

14) Marketing

We may use your contact details for venue updates or promotions only with your consent or as otherwise permitted by law. You can opt out at any time using the unsubscribe link or by contacting us. [\[oaic.gov.au\]](https://oaic.gov.au)

15) Complaints

If you have a privacy concern or complaint, please contact us first using the details below. If you're not satisfied, you may contact the Office of the Australian Information Commissioner (OAIC). For AML/CTF matters, note we are legally restricted from discussing suspicious matter reporting (see tipping-off above). [\[oaic.gov.au\]](https://oaic.gov.au), [\[austrac.gov.au\]](https://austrac.gov.au)

16) Changes to this policy

We may update this policy to reflect operational changes, AML/CTF reforms or privacy law updates. Material changes will be posted on our website and available at the venue. (Note: AML/CTF reforms and updated AUSTRAC guidance are staged through 2026—venues should monitor updates.) [\[austrac.gov.au\]](https://austrac.gov.au), [\[public.com.au\]](https://public.com.au)

Appendix: Key references we rely on

- Australian Privacy Principles (APPs) – Office of the Australian Information Commissioner (OAIC). [\[oaic.gov.au\]](http://oaic.gov.au)
- Privacy Act reforms and Notifiable Data Breaches (NDB) scheme – Attorney-General's Department. [\[ag.gov.au\]](http://ag.gov.au)
- AUSTRAC guidance for pubs & clubs with EGMs and Record-keeping – including CDD, SMRs/TTRs, 7-year retention. [\[austrac.gov.au\]](http://austrac.gov.au), [\[austrac.gov.au\]](http://austrac.gov.au)
- Tipping-off offence (s123 AML/CTF Act) – AUSTRAC guidance and legislation text. [\[austrac.gov.au\]](http://austrac.gov.au), [\[www5.austlii.edu.au\]](http://www5.austlii.edu.au)
- Politically Exposed Persons (PEPs) – AUSTRAC core guidance. [\[austrac.gov.au\]](http://austrac.gov.au)
- Victorian gambling regulatory framework – VGCCC and Gambling Regulation Act 2003 (Vic). [\[vgccc.vic.gov.au\]](http://vgccc.vic.gov.au), [\[vgccc.vic.gov.au\]](http://vgccc.vic.gov.au)

Clause: Independent Review

1. Independent reviews / audits

AML/CTF programs (including data handling) are subject to independent reviews at intervals consistent with AUSTRAC expectations.. [\[austrac.gov.au\]](http://austrac.gov.au)

Clause: Loyalty Program and Player Card Information

Club Savoy does not have a Loyalty Program

Contact us

Privacy & AML/CTF Enquiries

Manager Club Savoy

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