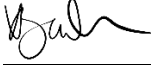


# Kedron-Wavell Limited Policy

Policy Title: FACIAL RECOGNITION POLICY	Policy Number: HR040
Effective Date: 9 <sup>th</sup> December 2024	Applicable to: Patrons and Staff
Approved Date: 1 <sup>st</sup> December 2024 (Revision Date): 1 <sup>st</sup> December 2025	Approved by: General Manager 

We at Kedron-Wavell Limited value your privacy and are committed to protecting your personal information. This policy outlines how we collect, use, and safeguard your information within our Facial Recognition system across our clubs: Kedron-Wavell and The Sands Social.

## Policy Statement:

We recognise the potential benefits of using Facial Recognition Technology (FRT) to minimise harm associated with gambling and alcohol for our patrons, including identifying individuals who have requested help as well as preventing suspended or banned individuals from entering our business. We are committed to using this technology in a responsible and ethical manner, while ensuring the protection of individuals' privacy and civil liberties.

## Principles:

The use of FRT is limited to the specific purposes that are justifiable and necessary for reducing harm associated with gambling, alcohol and/or the safety of our patrons and staff.

Data Security: Biometric data collected through facial recognition technology for reducing harm associated with gambling, alcohol and/or the safety of our patrons and staff is secured to prevent unauthorised access or misuse. Strict protocols for data retention have been implemented.

Limitations on Data Retention: Non-registered persons - Images captured through FRT and biometric data that is generated by FRT is stored for a maximum of one (1) minute (60 seconds).

Registered persons - Images captured through FRT and biometric data that is generated by FRT is stored until the authorisation to capture the image/ data is revoked by the registered person, at which point all stored data will be securely removed.

Accountability: Any use of FRT must be accountable and subject to oversight. This includes ensuring that individuals have access to their biometric data, and that there are mechanisms in place to address any violations of privacy or civil rights.

## Implementation:

To ensure that these principles are upheld, the following measures have been implemented:

Clear policies and procedures outlining the specific purposes for which FRT will be used to reduce harm associated with gambling and alcohol for our patrons.

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Receive consent from individuals before collecting and processing their biometric data using FRT for reducing harm associated with gambling and alcohol. Provide individuals with clear and concise information about the collection and use of their biometric data.

Secure storage and transmission protocols for biometric data collected through FRT. We have established policies and procedures for data retention and destruction.

We regularly test and evaluate the accuracy of our FRT and take steps to reduce the risk of false positives and false negatives.

Have signage in areas where FRT is being used and provide information on the specific purposes for which it is being used.

Established oversight mechanisms to ensure that the use of FRT is subject to accountability and transparency. There is a process for individuals to access their biometric data and for addressing any violations of privacy or civil rights.

**By implementing these principles and measures, we ensure that the use of FRT within our venues is upheld with security of data being our highest priority.**

#### Contact Us

If you have any questions about this policy or your personal information, you can contact us at:

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