

## Facial Recognition Technology (FRT) Policy

### Purpose of Facial Recognition Technology

Our venue uses Facial Recognition Technology (FRT) to enhance safety, ensure compliance with self-exclusion programs, and support harm minimisation initiatives. The use of FRT is strictly aligned with the principles of privacy, transparency, and compliance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs).

### How Data Is Collected

FRT analyses facial features of individuals entering specific areas of our venue. This analysis is conducted in **temporary memory** and only for the purpose of identifying matches against predefined databases, such as self-excluded individuals or banned patrons.

**No biometric data is stored** or retained after the analysis. If no match is found, the data is automatically purged from memory in real-time.

At no point is the facial data linked to an individual's identity unless a match occurs, and even in those cases, no biometric template is retained by our systems.

### How Data Is Stored

**Temporary Memory Only:** All facial data processed by FRT is held in temporary memory for the sole purpose of conducting real-time comparisons. This data is not stored in any database or retained after processing.

**Anonymous Analytics:** We may store aggregate, anonymised data for operational insights, such as people counts, gender demographics, and approximate age ranges. This data is fully anonymised and cannot be linked to any individual or facial profile.

### How Data Is Used

**Self-Exclusion Compliance:** FRT is used to assist in identifying individuals who have voluntarily enrolled in self-exclusion programs or have received formal ban notices.

**Operational Insights:** Anonymous and aggregate data may be used to optimise venue operations, such as managing crowd density and enhancing service offerings. This data contains no personal or identifiable information.

### Privacy and Compliance

Our use of FRT complies with the **Privacy Act 1988 (Cth)** and the **Australian Privacy Principles**. We ensure that all data handling practices meet the highest standards of security, necessity, and proportionality.

Individuals are informed about the use of FRT through clearly visible signage at venue entry points. Additional information about the use of FRT is available in this privacy policy and upon request.

All data collected and processed is limited to what is necessary to achieve specific safety and compliance objectives.

### **Transparency and Your Rights**

Our venue is committed to transparency regarding the use of FRT. If you have questions about how FRT operates or your rights under the Privacy Act, please contact us using the details provided below.

You have the right to understand how FRT is used and the purposes for which data is processed. You may also request additional details about how anonymous data is managed.

Michael Phillips  
ceo@port.golf  
03 5259 2492

