

# HBF PARK CATERING - PRIVACY POLICY

Effective Date: 1 July 2024

Last Updated: 1 July 2026

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## 1. Who we are

Catering and hospitality services at HBF Park are proudly provided by VenuesLive Management Services (WA) Pty Ltd as agent for the Western Australian Sports Centre Trust, trading as VenuesWest (ABN 47 894 197 015) (**we, us, our**).

VenuesWest is the owner of HBF Park. VenuesLive provides catering and hospitality services at the venue on behalf of VenuesWest and provides services to support these catering and hospitality operations. In delivering these services we may engage third parties, including third party suppliers, contractors and technology providers.

Personal information collected in connection with the provision of the catering and hospitality services at the venue is generally collected on behalf of VenuesWest. VenuesLive may access or process that information where reasonably necessary to provide catering and hospitality services at the venue.

VenuesLive handles personal information in connection with catering and hospitality services in accordance with this policy, applicable privacy laws, and the requirements of its agreement with VenuesWest.

We are committed to protecting your personal information. Depending on how you interact with us, your information will be handled in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**), as well as the *Privacy and Responsible Information Sharing Act 2024* (WA) (**PRIS WA**) and the Western Australian Information Privacy Principles (**IPPs**).

To the extent VenuesLive collects or handles personal information on behalf of VenuesWest, we do so as a contracted service provider consistent with the PRIS (WA), and the IPPs.

This policy explains how we collect, use, disclose and protect personal information when you interact with us.

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## 2. Scope

This policy applies when you:

- Enquire about or use our catering or hospitality services
  - Book or attend a catered event or function
  - Provide dietary or accessibility information
  - Use our websites or digital services
  - Interact with our staff
  - Apply for employment
  - Otherwise engage with us
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## 3. Contractors and service providers

In providing catering and hospitality services at the venue VenuesLive works with a range of contractors and suppliers, including catering and beverage suppliers, hospitality staffing providers, and IT and booking system providers.

These organisations may collect or handle personal information where reasonably necessary to deliver venue operations, events, safety or customer services. Where this occurs, they are required to handle personal information in accordance with applicable privacy laws and contractual obligations.

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## 4. Types of personal information we collect

In this policy, "personal information" means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether it is recorded in a material form or not. A reference to personal information includes sensitive information.

Depending on your interaction with us we may collect the following personal information:

- **Identity and Contact Information**

Name, address, email, phone number, and date of birth or proof-of-age details where required for the responsible service of alcohol

- **Event Information**

Function details, booking information and guest lists, RSVP and seating details, and dietary or guest preference information provided by you or your event organiser

- **Digital Information**

IP address, device details, browsing data, cookies and similar technologies, AI-generated meeting transcripts and summaries, voice recordings made using meeting recording or transcription tools

- **Transaction Information**

Invoices, payment information (processed securely via payment providers), enquiries, customer service interactions, and service requests

- **Incident and compliance information**

Information collected to manage incidents or comply with health, safety or regulatory requirements

- **Sensitive Information**

Dietary requirements, allergies or accessibility information required to safely provide catering services. Sensitive information will only be collected with consent, or where authorised or required by law. Dietary requirements may also indicate religious or philosophical beliefs; we collect and use that information only where reasonably necessary to provide catering services safely and appropriately. We do not collect other categories of sensitive information (such as racial or ethnic origin or sexual orientation) unless you give us express consent or the collection is otherwise authorised or required by law.

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## 5. How we collect personal information

We collect personal information:

- Directly from you when you contact us or provide information (enquiries, dietary requests)
- During face to face interactions at the venue (including during incident management)
- When staff record information provided verbally, and when identification documents are sighted or verified
- Through booking forms or websites
- From event partners or the venue
- From law enforcement or regulatory authorities
- From publicly available sources where lawful; through AI tools and meeting recording or transcription platforms when personal information is included in content shared with or captured by those tools

We take reasonable steps to ensure personal information is collected lawfully, fairly and only where reasonably necessary for our providing catering and hospitality services, or where otherwise permitted or required by law.

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## 6. Our role and event promoters and third party ticketing agents

Where an event organiser or host provides us with personal information about you (such as guest lists, dietary requirements or seating preferences), we ask them to make you aware of how we handle personal information, including by referring you to this policy.

Tickets to events held at the venue are generally sold through third party ticketing agents. These ticketing agents collect personal information in accordance with their own privacy policies and may do so on behalf of event organisers and the venue.

We are not responsible for the privacy policies of ticketing agents.

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## 7. Children

We may collect personal information relating to individuals under 18 years of age in connection with events, functions, activities and/or our services. Where appropriate we seek consent from a parent or guardian.

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## 8. Collection notices

Collection notices may be provided through signage, Conditions of Entry, ticket terms, verbal notice from staff, or by referring to this policy. If a meeting is to be recorded or transcribed using AI-enabled tools, all participants will be notified before recording commences and recording will not proceed without appropriate consent in accordance with applicable surveillance legislation.

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## 9. CCTV and surveillance

VenuesLive does not operate CCTV or surveillance systems at HBF Park.

Where CCTV operates within the venue, it is controlled by VenuesWest and managed in accordance with the VenuesWest privacy policy, which is available at <https://www.venueswest.wa.gov.au/privacy>.

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## 10. Automated decision-making and computer programs

We may use computer systems, digital platforms and artificial intelligence (AI) tools to assist with venue operations and event management. These systems and tools may process personal information for purposes such as ticketing and entry management, venue operations and analytics, security monitoring, planning and logistics, payment processing and internal administration.

These systems and tools support our operational decision making and service delivery. Where AI tools are used to assist with tasks involving personal information, we maintain human oversight of AI- assisted outputs before they are acted upon. We do not use AI tools to make decisions that significantly affect individuals without human review. Further information about the AI and meeting recording tools we use, and the safeguards that apply to them, is set out in the Artificial intelligence and meeting recording tools section below.

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## 11. How we use personal information

We collect and use personal information to:

- Manage catering and hospitality bookings
- Prepare and deliver food and beverage services
- Manage the responsible service of alcohol, including verifying proof of age where required
- Manage dietary requirements safely
- Process payments and invoices
- Communicate with clients and event organisers
- Comply with legal and regulatory obligations (including food safety and liquor licensing obligations)
- Improve our services
- Conduct surveys, feedback or research activities
- Send marketing communications where permitted by law

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## 12. Marketing

Marketing communications may be sent by HBF Park Catering, event organisers or promoters, where you have provided consent or where permitted by law.

You may opt out at any time by using the unsubscribe link or contacting us at [privacy@venueslive.com.au](mailto:privacy@venueslive.com.au).

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### 13. Venue technology and digital services

We use a range of digital and technology systems to support our catering and hospitality operations, and improve customer experience. This may include mobile applications, venue analytics tools, AI tools and other technology services. For further information about how AI tools process personal information, see the Artificial Intelligence and meeting recording tools section below.

Where these services are provided by third party technology providers, we take reasonable steps to ensure those providers handle personal information in accordance with applicable privacy laws and contractual obligations consistent with this policy.

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### 14. Websites, cookies & online technologies

Our websites may contain links to third-party sites. We are not responsible for their privacy practices.

Our websites and digital services may use cookies or similar technologies to improve functionality, analyse usage and deliver relevant content.

Our websites may also use third-party analytics, remarketing and advertising services (including Google Analytics and Google Ads), which use cookies to serve advertising based on prior visits to our websites and to report on visitor demographics and interests in aggregated form. We do not provide personally identifiable information to these services. You can opt out at any time through your browser settings, Google's Ads Settings or the Network Advertising Initiative opt-out page.

You can control cookies through your browser settings. Third-party platforms (such as social media providers) may collect information in accordance with their own privacy policies.

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### 15. Disclosure of personal information

We may disclose personal information to:

- VenuesWest, as the venue owner
- Ticketing agents, promoters, and event hirers
- IT, payment, digital service and AI platform providers
- Security and medical service providers
- Government and law enforcement or regulatory authorities
- Professional advisers

We do not sell, rent or license personal information to third parties. If a court, law enforcement agency or government authority requires us to disclose personal information, we will use reasonable endeavours to notify you promptly, unless we are prohibited from doing so by law or notification would prejudice the investigation of suspected fraud or other unlawful activity.

We take reasonable steps to ensure service providers handle personal information in accordance with privacy laws.

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### 16. Artificial intelligence and meeting recording tools

We use artificial intelligence (AI) tools to support internal operations such as drafting and analysing business communications, summarising content and supporting the management of our catering and hospitality operations. These AI tools may process personal information.

We use enterprise-grade AI platforms only, which include contractual commitments that content will not be used to train AI models. Staff are not permitted to use free or personal AI subscriptions for any purpose involving personal information.

We may use meeting recording and transcription tools. These platforms may capture the voice, name and other personal information of all participants, including external parties such as contractors, venue partners and government representatives. All participants will be informed before recording commences and recording will not proceed without appropriate consent in accordance with the *Surveillance Devices Act 1998* (WA) and applicable Commonwealth legislation. The same requirement applies where hardware AI recording devices are used.

Personal information processed through these platforms may be held by the AI system across multiple sessions. Information is retained only for as long as necessary and in accordance with our retention policies. These platforms are operated by companies based principally in the United States. Refer to Overseas Disclosure below.

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## 17. Overseas disclosure

Some service providers we use (including cloud storage, booking platforms, digital systems and AI tools) may store or process personal information in jurisdictions outside Australia, principally the United States. Where this occurs, we take reasonable steps to ensure appropriate privacy safeguards are in place, including by using enterprise-grade providers with contractual data protection obligations.

Where personal information is held by or on behalf of VenuesWest, we will not disclose personal information to, or store personal information with, a recipient located outside Australia unless: (a) a risk assessment required under applicable Western Australian Government policies (including cyber security and information classification policies) has been completed; and (b) we have taken reasonable steps to require that the recipient handles the personal information consistently with applicable Australian privacy laws, or another lawful basis for the disclosure applies (such as your informed consent or a disclosure required or authorised by law). We remain responsible for personal information disclosed to overseas recipients except where an exception applies under applicable privacy laws.

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## 18. Storage and security

We take reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, or disclosure. This includes secure systems, access controls, and staff training.

Information is retained only for as long as necessary and securely destroyed or de-identified when no longer required. Where personal information is held within AI platform memory or context, staff are required to manage and clear that information in accordance with our data retention obligations.

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## 19. Data breaches

If a data breach is likely to result in serious harm to any individual, we will notify the Office of the Australian Information Commissioner (OAIC) and affected individuals as required under the Notifiable Data Breaches scheme in the Privacy Act. We will assess potential eligible data breaches promptly and, where required, notify the OAIC within 30 days of becoming aware. Where we notify affected individuals, our notification will include recommended steps you can take to reduce the risk of harm.

Where the affected personal information is held on behalf of VenuesWest, we will also notify VenuesWest and comply with any applicable information breach notification requirements under PRIS WA and our agreement with VenuesWest.

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## 20. Access & Correction

You may request access to, or correction of, personal information we hold about you by contacting our Privacy Officer using the details below. We take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete, relevant, up to date and not misleading, and we will update your personal information if you tell us it is inaccurate or out of date.

We will respond within a reasonable period and may require proof of identity before providing access. The Privacy Act does not prescribe a fixed response period; we aim to respond within 30 days and will advise you if additional time is required.

Where your personal information is held on behalf of VenuesWest, we may refer your request to, or coordinate our response with, VenuesWest. Access to certain information held by VenuesWest may also be available under the *Freedom of Information Act 1992 (WA)*.

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## 21. Complaints

If you believe we have breached applicable privacy laws, you may lodge a complaint with our Privacy Officer and we will investigate and respond within a reasonable timeframe.

**Privacy Officer**

VenuesLive Management Services (WA) Pty Ltd

Suite 1.03, Quad 2, 6 Parkview Drive, Sydney Olympic Park, NSW 2127 Australia

Email: [privacy@venueslive.com.au](mailto:privacy@venueslive.com.au)

Phone: 1300 878 610

If you are not satisfied with our response you may contact the Office of the Australian Information Commissioner (**OAIC**) at [www.oaic.gov.au](http://www.oaic.gov.au) . If your complaint relates to personal information handled on behalf of VenuesWest, we may refer the complaint to VenuesWest, and you may also contact the Western Australian Information Commissioner in relation to personal information handled under PRIS WA.

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## **22. Changes to this policy**

We may update this policy from time to time. The current version will be published on our website with the *Last Updated* date.