



# Privacy Policy

*Last updated: 30 July 2025*

## 1. **SCOPE**

This Privacy Policy (**Policy**) outlines how Adelaide Venue Management ABN 50 676 936 954 (**AVM, we and us**) manages the collection and handling of personal information, including compliance with the Information Privacy Principles<sup>1</sup>. In this Policy, 'personal information' means information or an opinion, whether true or not, about an individual (a natural person) whose identity is apparent, or can reasonably be ascertained from the information or opinion.

## 2. **POLICY DETAIL**

### 2.1 **Application of this Policy**

This Policy applies if you:

- use any of our products or services, including by attending an event at any premises that we manage (Adelaide Convention Centre, Adelaide Entertainment Centre, Coopers Stadium and The Drive<sup>2</sup>).
  - visit our corporate website at [avmc.com.au](http://avmc.com.au) or any of our venue affiliated websites, digital channels or social media channels, or subscribe to our mailing lists or subscription panels (**Sites & Channels**).
  - are one of our customers, contractors or suppliers or are seeking employment with us, (referred to as **you** and **your**).

By providing us with your personal information, you authorise the personal information being collected, held, used and disclosed in accordance with this Policy. This Policy is in addition to any other applicable terms and conditions that may apply to your relationship and/or engagement with us, including Conditions of Entry at our premises.

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<sup>1</sup> [PC 012 - Information Privacy Principles Instruction](#)

<sup>2</sup> AVM is the official presenting partner of concerts and functions at The Drive. This venue is managed and operated by Tennis SA.

## **2.2 Collection – How we collect information about you**

### **Who we collect information about**

We may collect and hold personal information about:

- current, potential and former customers, contractors and suppliers (including media contacts).
- current and prospective team members of AVM, and their next-of-kin or emergency contacts; and
- individuals who register for and attend events at premises that we operate, or who we otherwise interact with in the course of our business.

#### **2.2.1 Information we collect**

We collect personal information in order to manage and conduct our business, to provide and market our products and services, and to meet our legal obligations. Depending upon the nature of your relationship with us, the type of personal information we collect, and hold may include:

#### **2.2.2 Customers:** information as required for our relationship with you, such as:

- your basic contact information (e.g. name, address, contact details, date of birth, and other personal details).
- details of the products and services we have provided to you, or that you've enquired about, including through competitions and giveaways.
- your financial information (e.g. bank account or credit card details) when you enter into a transaction with us, or payment history.
- records of our communications or dealings with you, including any responses to surveys, feedback, complaints, incidents requests or queries, including chat session logs.
- information about your participation in our customer/loyalty reward programs and competitions.
- your website usage information (only to the extent that this may be linked with you as a customer, such as interactions with apps or services, product searches and data concerning activity).
- information that you post to our Sites or Channels.
- when you access our products or services, or our Sites or Channels, we may collect information that is sent to us by your computer, mobile device or other access device, including – your device ID, device type, IP address, geo-location, computer and connection information, referral URL, statistics on page views, traffic to and from our products, services, Sites and Channels;
- images of you (e.g. photographs or videos of you, facial recognition data from our facial recognition technology systems).
- closed circuit television (CCTV) footage from any of our premises.
- body cam footage from body cameras worn by our Security team members.

**2.2.3 For prospective team members or for contractors and suppliers:** information for the purpose of commencing and conducting a business or employment relationship with you. This may include (as applicable):

- your basic contact information (e.g. name, address, contact details, date of birth, and other personal details).
- your government identifiers (e.g. tax file number, driver's licence, birth certificate, citizenship certificate, passport and/or visa details).
- information about your occupation, employment history, education and suitability for the role or relationship, including whether you hold any licences/permits, drug tests or police clearances required for the role.
- your financial information (e.g. bank account details or payment history for invoicing and/or payroll purposes).
- details about engagement by us, including the type of products and/or services you provide to us, and other information relating to your past or current performance.
- name and contact details of emergency contacts.
- your health and medical information, including any pre-engagement medical checks.
- diversity information, which might include gender, ethnicity, languages spoken, relationship status etc.
- biometric information (e.g. fingerprints, when you clock in and out of shifts).
- CCTV footage, body cam footage, and images of you from our facial recognition system.

#### **2.2.4 How we collect personal information**

We use different methods to collect your personal information. We will generally collect personal information directly from you (e.g. in person, by telephone or through written information or forms that you submit to us by mail, email, in person or through our Sites and Channels). However, we may also collect personal information from third parties in some instances, for example, a report provided by a medical professional, an employment or credit reference check, or from CCTV and/or facial recognition systems that may be placed on and around our premises.

If you provide us with personal information about another person, you warrant that you have that person's permission to do so.

#### **2.2.5 What happens if you don't provide us with your personal information**

You are not required to provide us with your personal information. However, in some cases, if personal information we request is not provided, it may affect our ability to do business with you, including that:

- we may be unable to supply the relevant product or service or to perform our obligations to you; and
- if you are an applicant for employment or a contractor, we may be unable to employ you or engage you in certain roles within, or for, our business.

## **2.3 How we use personal information**

In general, we collect, hold, use and disclose your personal information in accordance with this Policy, including for the following purposes:

- to verify your identity and communicate with you.
- to provide and market our products and services to you, and to communicate with you about the products and services we provide.
- to help us operate, manage and improve our business (including our products and services).
- to process, administer, collect payments from or make payments to you, and if applicable, make appropriate taxation deductions.
- to assess suitability of potential team members or contractors and assess performance of current team members and contractors.
- to ensure health and safety on our premises.
- to respond to any feedback, queries or complaints.
- to conduct appropriate checks for credit-worthiness.
- to disclose the information to third parties (such as our agents, IT service providers, business partners, contractors and suppliers) for the above purposes.
- to comply with our legal obligations, including our reporting obligations; and
- as otherwise may be required for the general management and conduct of our business.

In addition, CCTV footage and body cam footage (including facial recognition technology) specifically may be collected and used for the following purposes:

- detecting and deterring unauthorised access to, and criminal behaviour on, our premises.
- monitoring the safety and security of our customers, team members, contractors and suppliers, and premises, including completing incident investigations and recording evictions from venues by security or law enforcement.
- reviewing the actions of our team members and contractors; and
- to protect our legal interests in accordance with applicable law.

## **2.4 Who we may disclose personal information to**

We may disclose your personal information for the purpose for which it was collected (or a related secondary purpose) and otherwise where permitted or required by law or with your consent.

Some of the recipients we may disclose your personal information to include our insurers or third-party service providers who help us to deliver our products and services and to conduct our business. Each of these third parties are carefully selected and are only permitted to use your personal information to the extent necessary for them to provide their services to us.

### **2.4.1 Offshore disclosure**

From time to time, we may engage contractors or suppliers outside of Australia to provide services to us. Please note that this may not always involve a disclosure of personal information. Save for the above, as at the date of this Policy, we are only likely to disclose personal information to third parties located in Australia.

## **2.5 Security of your personal information**

We take reasonable, industry-standard steps to protect personal information held by us from misuse and loss and from unauthorised access, modification or disclosure, for example through the use of technical and physical security measures, including restricting access to electronic records through data encryption and role-based technical access restrictions.

## **2.6 Access and correction of your personal information**

You are entitled to request access or correction of records of personal information held about you in accordance with the *Freedom of Information Act 1991* (SA). In processing your request, we will comply with our obligations under applicable laws, noting that we may need to verify your identity before we allow you to access or correct your personal information, and are permitted to withhold the disclosure of personal information in prescribed circumstances.

Our facial recognition technology automatically deletes face-matched data after 24 hours and non-matched data is not retained. CCTV footage is kept for a minimum of 30 days and incidents are retained as outlined above.

## **2.7 Marketing and opting out**

If you consent to receiving direct marketing communications from us, we may use your personal information to contact you from time to time whether by email, phone or SMS, to identify a product or service that you may be interested in or to tell you about new products or services, special offers, promotions and events, or to tell you about job vacancies if you have registered your interest with us.

If you do not want us to contact you for these purposes, you can withdraw your consent and let us know at any time by unsubscribing from the mailing list by clicking on the link in the marketing communication or contacting the Privacy Officer (at the contact details below).

## **2.8 Cookies and links to other sites**

To improve our Sites, Channels and advertising, and to help us better understand browsing behaviour, when you use our Sites and/or Channels we may use website measurement software and other analytics tools and services (including Facebook Pixel and Google Analytics) to gather information such as traffic patterns, mouse click activity, IP addresses, and any other information you may provide through use of our Sites and/or Channels. This information is aggregated and anonymised so that you cannot be identified.

Like many other websites on the internet, AVM may use 'cookies' to store and track information about you when you are on our Site or Channels. A cookie is a data file that is sent to your browser from a web server and stored on your computer (or other device), then sent back to the server by your browser each time you access certain sections of our Site or Channels.

This information helps us to remember your preferences and can help us to provide a tailored experience and customised content and material on our Sites and Channels. This information may be retained in an anonymous or aggregated form after we have erased personal information that identifies you from our systems.

You can choose to disable cookies via your device's website browser settings. However, if you choose to reject cookies, you may not be able to use or access some features of the services that we offer.

AVM may provide links or references to other websites from our Sites or Channels. This Policy does not apply to those websites, and we take no responsibility for any information collected by such third parties.

## **2.9 Changes to this Policy**

This Policy is current as at July 2025. We may amend and update this Policy from time to time to take account of new laws and technology, changes to our operations and practices and the changing business environment. The most current version of this Policy can be obtained by contacting our Privacy Officer via the details below.

By continuing to use our products, services, Sites or Channels, or otherwise continuing to deal with us, you accept these changes and this Policy as it applies from time to time. However, if you do not agree to an amendment, you can notify our Privacy Officer at the contact details set out below or discontinue your use (e.g. by unsubscribing from our Channels).

### **3. HOW TO CONTACT US AND COMPLAINTS**

If you have any questions about personal information or are unhappy with how we've handled your personal information, please contact our Privacy Officer using the following contact details:

**By email:**     [Privacy@avmc.com.au](mailto:Privacy@avmc.com.au)  
                    Attention, Privacy Officer

**By post:**        GPO Box 2669  
                    Adelaide SA 5000

We will investigate any complaint and respond to you as quickly as possible (usually within 20 working days of hearing from you). For further information about making a privacy complaint, or the progress or outcome of any investigation, please contact the Privacy Officer using the details above.

### **4. RELATED POLICIES, LEGISLATION AND INSTRUCTIONS**

- 4.1     *Privacy Act 1988*
- 4.2     *Privacy and Other Legislation Amendment Bill 2024*
- 4.3     *Privacy Regulation 2013*
- 4.4     *Circular PC 012: Information privacy principles (IPPS)*
- 4.5     *Information Privacy Principles Instruction*
- 4.6     *Adelaide Venue Management Website*
- 4.7     *Adelaide Convention Centre Website*
- 4.8     *Adelaide Entertainment Centre Website*
- 4.9     *Coopers Stadium Website*