

# COMS Detect Privacy Statement

## ***Introduction***

COMS Detect is a facial recognition system used to monitor for persons who have been excluded from gambling and to monitor player session length.

## ***Lawful Purpose***

COMS Detect uses facial recognition camera technology. The technology operates for the following purposes only:

- Enforcement of exclusion orders: When a person enters a gambling venue, their image is checked to see if it matches that of an excluded person in the relevant database of excluded persons.
- Harm minimisation/gambling host responsibility: The system alerts venue staff if a player has been playing for a lengthy period in one session. A person who regularly gambles for long periods, without taking a break, is more likely to be experiencing problem gambling.

Signage is displayed at venues where the system is operating, advising that:

### **Facial Recognition-Based Player Exclusion Support System and Session-Length Monitoring in Place**

This venue operates a facial recognition system to monitor for persons who have been excluded from gambling at this venue and to monitor player session length. The system alerts venue staff if an excluded person attempts to enter the gaming room. The system also alerts venue staff if a player has been playing for a lengthy period in one session (a general sign of problem gambling).

Images are scanned for the purpose of checking for excluded persons and monitoring session length only. If there is no exclusion match or no concern with a player's session length, the data is deleted within 72 hours. Images are not used for any other purpose.

## ***Storage and Security of Personal Information***

All personal information is held in a secure database. Sensitive data is encrypted.

## ***Extent of Information Held and Transfer of Information to Third Parties***

The personal information held and/or collected by the system may include the following:

- Name.
- Date of birth.
- Photo/s.
- Address.
- Contact information such as phone number and/or email.

- The expiry date or duration of the exclusion.
- Details of prior exclusion order breaches.
- Details of prior lengthy sessions of play.

No audio recordings are collected.

We may hold information that has been provided to us by persons authorised by you. For example, if you have authorised a treatment provider, or exclusion order administrator, to request an exclusion on your behalf, we may hold the information contained in that exclusion order.

The personal information will be accessible by our staff and authorised contractors, venue staff, and gaming society staff, for the purpose of administering and monitoring the system.

We may transfer personal information to third parties for lawful purposes and when required by law. For example, the information provided in your exclusion order will be shared with the venue's gaming society as required by the Gambling Act 2003, and details of breaches of exclusion orders may be shared with the regulator, the Department of Internal Affairs and/or the Police.

Anonymised data may be collated for reporting purposes.

### ***Unique Identifiers***

Each photo taken is encrypted and assigned a unique identification number. A person can have multiple photos assigned. The unique identification number is recorded and will be used for the above purposes only.

### ***Information Securely Disposed of Once its No Longer Needed***

The COMS Detect facial recognition cameras extract faces from live video stream. These faces are checked against images stored in the relevant database of excluded persons. These images are automatically securely deleted within 72 hours if there is no match. If there is a match, and the identity of the excluded person is manually confirmed, the result is noted and the information is retained for reporting. The image of the excluded person is also retained until the end of the exclusion period, to allow increased accuracy of future detection and identity verification purposes.

We keep details of your exclusion request/exclusion order for the duration of the exclusion period. At the end of the exclusion period, this information is automatically securely deleted.

COMS Detect cameras recognise when an individual has been in the gambling area for lengthy sessions of play and alert venue staff of this. If a lengthy session of play is not detected, the images are automatically securely deleted within 72 hours. If a lengthy session of play is detected, the images and details of the session length may be retained for up to three months to help venue staff to monitor for additional lengthy sessions of play (regular lengthy sessions

of play is a general sign of problem gambling).

### ***Right to Request Personal Information and Correct Personal Information***

You have the right to ask for a copy of any personal information we hold about you, and to ask for it to be corrected if you think it is wrong. If you'd like to ask for a copy of your information, or to have it corrected, please contact us at [info@coms.net.nz](mailto:info@coms.net.nz), or 0800 266 797. Within 20 working days of such a request we will notify you of our decision. There may be circumstances where that timeframe needs to be extended; if so, we will notify you of that.

### ***Changes to this Statement***

We reserve the right to modify or amend this statement at any time. All changes will be uploaded to our website ([www.coms.net.nz](http://www.coms.net.nz)) and will be marked with an effective date. Any information collected prior to the change in the statement will be treated in accordance with the previous statement. Any information collected after the effective date of the statement will be treated in accordance with the updated statement.

### ***Additional Privacy Information***

More information on privacy can be found on the Privacy Commissioner's website <https://www.privacy.org.nz>

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