

Policy PUBLIC 001

Policy Title **Privacy Policy - Public**

Entity Taree RSL and Golf Club Ltd ABN 38 000 995 415 trading as Club Taree (the "Club", "we" or "us")

Scope This policy applies to all club members, members' guests, temporary members, and other customers of the club ("**you**"), and to all the activities of the Club.

 This policy does not apply to the Club's treatment of employee records, which are directly related to a current or former employment relationship between the Club and its employee.

Purpose The purpose of this policy is to protect the personal information of our customers, which we take very seriously, and to ensure that the Club complies with the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APP**). These govern the way we must manage personal information.

 This policy sets out how we collect, hold, use, disclose and otherwise manage personal information about our members and other customers. We encourage all members and customers to check our website regularly for any updates to this privacy policy. We may update this policy whenever we consider appropriate, for example, to reflect changes to the law or to our business.

Information Collection **Types of Information Collected**

 We may collect and hold personal information about you, that is, information that can identify you such as your name, address, occupation, date of birth, proof of age, other contact details and the extent of your use of (and preferences in relation to goods and services offered by, or available at or from the Club, and other information relevant to providing you with the services you are seeking.

 If you choose to correspond with us by email, we may retain the content of your email messages together with your email address and our responses. Stored messages are provided with same protection as other information, but email is not deemed to be a secure form of communication, so we ask that you do not send us any sensitive information by email.

Purpose of Collection

The Club limits its requests for information to what is required to ensure provision of good service and to add new and/or improved services. Generally we will collect, hold and use your personal information for one or more of the following reasons:

- To identify you and process an application you have made for membership or renewal, or to admit you to the Club's premises
- To establish and maintain your membership of the Club, including providing you with newsletters, magazine and annual reports
- To contact you to advertise and market events, promotions, competitions, activities and offers provided or procured by the Club, or by a company in which the Club has an ownership interest, (including by direct mail, telephone, email, SMS and MMS), and to register you for such events, promotions, competitions, activities and offers
- To include your details in the Golf Club Fixtures book
- To provide products and services to you, and to administer any benefits to which you may become entitled
- To provide you with information about other services that may be of interest to you
- To provide you with promotional information about us
- To facilitate our internal business operations, including without limitation the fulfilment of any legal enquiries, addressing security concerns and training our employees and contractors
- To analyse usage of products and services offered by the Club and customer needs
- To develop new and/or improved products and services for customers
- To comply with statutory requirements under legislation relating to registered clubs, liquor, gaming, anti-money laundering, counter-terrorism and other legislation which may apply to the Club.

Methods of Collection

Personal information will generally be collected directly from you through the use of any of our standard forms, competition entry forms, email, comments/contributions to our social media sites, visitor sign-in terminals or when you deal with us in writing, by telephone or in person. Information about members' purchase of products or use of services or facilities will be collected via use of a membership card at our "Members' Kiosk", any of our Point of Sale terminals and our gaming machines.

Job applicants, staff, contractors, suppliers and volunteers

We also collect personal information about job applicants, Club staff, volunteers who work with us, and details of other people who come into contact with the Club such as contractors and suppliers for the primary purpose of assessing and engaging or employing the person. The Club also holds and uses such personal information for managing the employment or engagement to meet its legal obligations.

Information received from other parties

Sometimes, someone else may provide us with your personal information, with or without your direct involvement. For example, we might collect personal information from:

- another organisation of which you are a member, such as a local sporting club using our facilities, or community organisation;
- a regulatory authority, a local liquor accord or another club industry organisation; or
- your representative(s).

Failure to Provide Information

If the personal information you provide to us is incomplete or inaccurate we may be unable to provide you with the products or services you are seeking, or admit you as a member or with entry to the Club's premises.

Internet Users

If you access our website we may collect additional personal information about you including your Internet Protocol (IP) address, domain name, type of operating system, type of browser and your general area of location. Also, our website uses cookies. The main purpose of cookies is to identify users and to prepare customised web pages. Cookies do not identify you personally, but they may link back to a database record about you. We use cookies to monitor usage of our website and to create a personal record of when you visit our website and what pages you view, so that we may serve you more effectively.

Use and Disclosure

Generally, we only use and disclose personal information about you for the purpose for which it was collected, or for a related purpose as permitted by the Privacy Act or for uses for which you have given consent (which may be express or implied). We may disclose personal information about you:

- To service providers who assist us in operating our business, perform functions on our behalf or provide services to us. These service providers are required to comply with the Privacy Act and the APP.

- To other organisations in which the Club has an ownership interest, for the purpose of them marketing their products and services to you
- To an actual or prospective purchaser of the assets and operation of our business or an actual or prospective amalgamation partner (if we engage in an amalgamation process with another registered club)
- To anyone to whom we are required or authorised by law to do so
- To relevant authorities when the Club believes that unlawful or undesirable activity is being or has been conducted
- To anyone authorised by you to receive your personal information

We will only disclose your personal information (including sensitive information) to third parties on the basis that they agree with us to keep your information confidential (except where we are authorised or required by law to disclose the information). Otherwise, the Club will only disclose personal information to a third party where the Club has a belief that its use and/or disclosure is necessary:

- to lessen or prevent threats to an individual's life, health or safety
- to investigate any unlawful or undesirable activity or serious misconduct which is being or has been conducted
- to assist enforcement bodies, such as the police, with their activities;
- to assist in locating a missing person;
- to establish, exercise or defend a legal or equitable claim; or
- for the purpose of confidential alternative dispute resolution.

You consent to us disclosing your personal information to the third parties listed above, and similar organisations who may in turn provide your information to other third parties. You can withdraw your consent at any time by informing us in writing (except where we are authorised or required by law to disclose the information).

The Club does not transmit personal information overseas. As far as the Club is aware none of its contractors transmit or store data overseas.

Information collected purely for the purpose of temporary members and members' guests entering the club will not be used for any purpose other than meeting the requirements of the Registered Clubs Act and associated legislation, and in the instances of unlawful behaviour or a risk to health and safety, in which case the information will be used in the process of identifying the persons involved.

	<p>Temporary members and members' guests are required to provide proof of address (and may be required to provide proof of age). However, it is up to the visitor whether they allow their proof of identity document to be scanned or whether they complete the electronic register manually, providing as a minimum their first initial, surname and address.</p>
Information security	<p>The Club takes information security very seriously. Your personal information is stored in different ways, including in paper and electronic form. All reasonable measures are taken to ensure that your personal information is stored safely to protect it from misuse, loss, unauthorised access, modification or disclosure, including electronic and physical security measures. We use 256-bit SSL (secure socket layer) encryption technology that protects information as it is sent from your browser to our secure server, which is the current industry standard. This technology may be improved to stay in line with future industry standards.</p> <p>If the Club receives personal information about you which it did not request and which it does not reasonably require, we may destroy or de-identify this information where appropriate.</p>
Payments made by you over the Internet	<p>By utilising NAB (National Australia Bank Ltd) Transact we ensure no sensitive credit card payment data enters our environment directly. Payment card details are posted from your web browser directly to the NAB Transact payment gateway via HTTPS. NAB in turn confirm the payment has been received by providing only a masked card number, expiry date and card type. By utilising NAB Transact for our payment processing, we can offer customers complete PCI DSS compliance whilst still hosting our own payment page.</p>
Payments by card not over the internet	<p>Card details received from you over the phone or by any other means other than our website are entered into a secure NAB EFTPOS terminal. Any physical record of sensitive card information is destroyed immediately after the transaction is processed.</p>
Access and Correction	<p>You may access the personal information we hold about you by making a written request to our CEO. We will endeavour to provide you with access to the information requested within 30 days. We may charge you a reasonable fee for processing your request. We may decline a request for access to your personal information if the Privacy Act prohibits it or does not require us to provide access.</p> <p>The Club relies on the information you provide to us to be accurate, complete and up to date. If, upon receiving access to your information, or at any other time, you believe the personal information we hold about you is inaccurate, incomplete or out of date please notify us immediately. We will</p>

	take reasonable steps to correct the information so that it is accurate, complete and up to date.		
Links to other websites	Our website may contain links to other sites. We are not responsible for the privacy practices of linked sites and so linked websites are not subject to our privacy policy and procedures.		
Complaints	<p>If you wish to make a privacy complaint, please put your complaint in writing with as much detail us as possible and send it to us by letter or email using the details listed above.</p> <p>The Chief Executive Officer, or another representative of the Club, will consider (and may investigate) the complaint and provide you with a written response within a reasonable timeframe (taking into consideration the nature of your complaint).</p> <p>If you are not happy with the response received from the Club, you can contact the Office of the Australian Information Commissioner.</p>		
Feedback	<p>If you have any questions regarding our privacy policy or how your information is held, please contact:</p> <p>The Chief Executive , Club Taree, PO Box 40, Taree, NSW 2430 Telephone: 02 6539 4000 Email: ceo@clubtaree.com.au</p> <p>For information about privacy in general please visit www.privacy.gov.au or call the Office of the Australian Information Commissioner.</p>		
Breach	If any employee or officer of the Club breaches these rules they may be subject to relevant counselling and/or disciplinary action, up to and including dismissal. They may also be subject to civil or criminal legal proceedings.		
Associated Documents	<i>Registered Clubs Act 1976</i> (NSW) <i>Registered Clubs Regulation 2015</i> (NSW) <i>Privacy Act 1988</i> (Cth) Australian Privacy Principles		
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