

PRIVACY POLICY - INGLEBURN RSL CLUB

Ingleburn RSL Club is subject to the provisions of the Privacy Act 1988; the Act contains 13 Australian Privacy Principles that set standards for the handling of personal information. Any personal information provided by our Members to this Club (e.g. Name, address, date of birth and contact details), including information collected as a result of a Membership Card being placed in a gaming machine or any other Club machine that is linked to a Member loyalty system (not ATMs) that may provide a benefit or service to our Members, will be protected.

Ingleburn RSL Club will not disclose your personal information to any other party or organization unless there is a legal requirement to do so. Ingleburn RSL Club may disclose personal information to relevant authorities if they believe there is a threat to any Members life, health, or safety, or public health or safety.

If there is reason to suspect that unlawful activity has been, is being or maybe engaged in, personal information may be provided or disclosed as a necessary part of any investigation to relevant persons or authorities. If Ingleburn RSL Club is obliged to provide any information to a third party that provide services under contract to this Club, these contractors are obliged by law to keep and maintain this information confidential and secure.

Your personal information, including information about you obtained via your Membership Card being placed in a gaming machine (not ATMs) may be used by the Club for the internal purposes of marketing and promotions, to provide and improve our services to our Members and to provide the latest information about those services and promotions. As a Member you have the right to access any personal information that the Club may hold about you, including the right of correction about that information, if you require any further information or clarification about the Privacy Policy please contact Administration. Contact details are at the end of this Policy.

This Privacy Statement has been unanimously adopted and endorsed by your Board of Directors

The Principles do not apply to employee records. As a result, this Policy does not apply to the Club's treatment of employee records, where the treatment is directly related to a current or former employment relationship between the Club and an employee.

This Policy is available free of charge and can be accessed on the Club's website at www.ingleburnrsl.com.au

AUSTRALIAN PRIVACY PRINCIPLES (APP) PRIVACY POLICY

OF THE

INGLEBURN RSL CLUB

Ingleburn RSL is an organisation registered under the Registered Clubs Act 1976. This policy accords with the Australian Privacy Principles which became effective on 12 March 2014.

The principal activities of the club are:-

- Providing a venue for members and guests to engage in social activities
- Supporting the community in sporting events
- Providing members and their families access to a range of services
- Providing affordable meals
- Providing a safe friendly environment for locals to meet

APP 1 - Open and transparent management of personal information

(a) the kinds of personal information that the entity collects and holds;

The Club collects personal information from members including name, address, occupation, date of birth, proof of age and contact details.

(b) how the entity collects and holds personal information;

Members

One way we collect personal information from you is for you to lodge an application form approved under the Registered Clubs Act. We may also collect information from you when you complete other forms, participate in competitions and submit an application for employment. This personal information may include your full name, date of birth, phone and fax numbers, e-mail address, and street and postal address. In some occasions, a recognised form of identification i.e. passport or drivers license will also be required to confirm the personal details provided.

Ingleburn RSL Club requires supporting documentation to process application forms and the unique identification number is recorded on the application form.

Visitors and Guests

Under the Registered Clubs Act patrons visiting the club must produce a recognised form of identification i.e. passport, drivers license or proof of age card to gain entry to the premises. Ingleburn RSL uses terminals to gather this information and to protect the data collected i.e. addresses of patrons. Scanning of licenses is optional, and if preferred, use of manual sign-in, via the terminals is available for patrons once the form of identification has been sighted by an authorised officer of the club.

(c) the purposes for which the entity collects, holds, uses and discloses personal information;

The club collects this information in order to:

- Process membership applications
- Meet statutory requirements under the Registered Clubs Act and other relevant legislation
- Contact members about events and activities provided by the club

When or before Ingleburn RSL Club collects personal information, the club will take reasonable steps to inform you of:

- the purposes for which the information is collected;
- where applicable, any law that requires the particular information to be collected, and
- the main consequences for the user if all or part of the information is not provided.

We will only use your personal information (including your e-mail address) for the purpose for which you have provided it, e.g. for application of club membership or to gain entry to the club as a visitor or guest. We will not use it for any other purpose, nor will we disclose it, unless we have your consent or in other circumstances where such use or disclosure is permitted under the Privacy Act, or compelled by Law.

We will only record your e-mail address if you send us a message. Your email address will only be used for the purpose for which you have provided it and will not be added to a mailing list or used for any other purpose with your consent.

From time to time, we may wish to carry out a voluntary survey for feedback. Before collecting survey results, we will advise you of the purpose of the survey e.g. to gain information for the club to improve services etc. Participation in surveys is optional.

(d) how an individual may access personal information about the individual that is held by the entity and seek the correction of such information;

Individuals may access and alter records containing their personal information. To change your name on the membership database supporting documentation from a government source is required. Change of addresses can be done by completing a “Change of Address” form, by letter or by use of the internet.

(e) how an individual may complain about a breach of the Australian Privacy Principles, or a registered APP code (if any) that binds the entity, and how the entity will deal with such a complaint;

Ingleburn RSL Club must comply with the Privacy Act and the Australian Privacy Principles which regulates, among other things, the collection, storage, quality, use and disclosure of personal information.

If you wish to register a complaint about a breach of these principles, you may do so by contacting the Chief Operating Officer at the Club who will thoroughly and fairly review the complaint. If a breach is found to have occurred, immediate action will be taken to rectify the problem to ensure a similar breach does not re-occur.

(f) whether the entity is likely to disclose personal information to overseas recipients;

The Club is not likely to disclose any personal information to overseas recipients.

(g) The Club's APP policy is available free of charge and can be accessed on the Club's website at www.ingleburnrsl.com.au

APP 2 - Anonymity and pseudonymity

(a) Under some circumstances, individuals may have the option of not identifying themselves, or of using a pseudonym, when dealing with the Ingleburn RSL Club in relation to a particular matter.

(b) However, the Club's obligations to identify members, temporary members and guests overrides this option, so we are obliged to ensure we collect the true identity of patrons as they enter our premises.

(c) We will also not accept anonymity or use of a pseudonym where it is impracticable for us to deal with individuals who have not identified themselves or who have used a pseudonym.

APP 3 - Collection of solicited personal information

(a) The Club will only collect personal information that is reasonably necessary for, or directly related to one or more of the Club's functions or activities.

(b) The Club will not solicit sensitive personal information.

APP 4 - Dealing with unsolicited personal information

If:

(a) the Club receives personal information that has not been solicited, we must, within a reasonable period after receiving the information, determine whether or not we could have collected the information under Australian Privacy Principle 3 if we had had solicited the information.

(b) If the Club determines that we could not have collected the personal information; and the information is not contained in a Commonwealth record, we will, as soon as practicable, destroy the information or ensure that the information is de-identified.

APP 5 - Notification of the collection of personal information

- (a) At or before the time or, if that is not practicable, as soon as practicable after, the Club collects personal information about an individual, we will take such steps (if any) as are reasonable in the circumstances:
- (i) to notify the individual of such matters referred to in subclause 5(b) below as are reasonable in the circumstances; or
 - (ii) to otherwise ensure that the individual is aware of any such matters.
- (b) The matters for the purposes of subclause 5(a) are as follows:
- (i) the identity and contact details of the Club;
 - (ii) if:
 - (ii.1) the Club collects the personal information from someone other than the individual; or
 - (ii.2) the individual may not be aware that the Club has collected the personal information;the fact that the Club so collects, or has collected, the information and the circumstances of that collection;
- (c) if the collection of the personal information is required or authorised by or under an Australian law or a court/tribunal order— the fact that the collection is so required or authorised (including the name of the Australian law, or details of the court/ tribunal order, that requires or authorises the collection);
- (d) the purposes for which the Club collects the personal information;
- (e) the main consequences (if any) for the individual if all or some of the personal information is not collected by the Club;
- (f) any other Club, body or person, or the types of any other APP entities, bodies or persons, to which the Club usually discloses personal information of the kind collected by the entity;
- (g) that the APP privacy policy of the Club contains information about how the individual may access the personal information about the individual that is held by the entity and seek the correction of such information;
- (h) that the APP privacy policy of the Club contains information about how the individual may complain about a breach of the Australian Privacy Principles, or a registered APP code (if any) that binds the entity, and how the entity will deal with such a complaint;
- (i) whether the Club is likely to disclose the personal information to overseas recipients;

- (j) if the Club is likely to disclose the personal information to overseas recipients—the countries in which such recipients are likely to be located if it is practicable to specify those countries in the notification or to otherwise make the individual aware of them.

APP 6 - Use or disclosure of personal information

- (a) If the Club holds personal information about an individual that was collected for a particular purpose (the primary purpose), we must not use or disclose the information for another purpose (the secondary purpose) unless:
- (i) the individual has consented to the use or disclosure of the information; or
 - (ii) subclause (b) below applies in relation to the use or disclosure of the information.
- (b) This subclause applies in relation to the use or disclosure of personal information about an individual if:
- (i) the individual would reasonably expect the Club to use or disclose the information for the secondary purpose and the secondary purpose is:
 - (i.1) if the information is sensitive information—directly related to the primary purpose; or
 - (i.2) if the information is not sensitive information—related to the primary purpose; or
 - (ii) the use or disclosure of the information is required or authorised by or under an Australian law or a court/tribunal order; or
 - (iii) a permitted general situation exists in relation to the use or disclosure of the information by the Club; or
 - (iv) a permitted health situation exists in relation to the use or disclosure of the information by the Club; or
 - (v) the Club reasonably believes that the use or disclosure of the information is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

Written note of use or disclosure

- (c) If the Club uses or discloses personal information in accordance with paragraph (b)(sub clause v) above, the Club must make a written note of the use or disclosure.

Exceptions

- (d) This principle does not apply to the use or disclosure by the Club of:

- (i) personal information for the purpose of direct marketing; or
- (ii) government related identifiers.

APP 7 - Direct Marketing

- (a) If the Club holds personal information about an individual, it must not use or disclose the information for the purpose of direct marketing.

Exceptions—personal information other than sensitive information

- (b) Despite subclause (a), the Club may use or disclose personal information (other than sensitive information) about an individual for the purpose of direct marketing if:
 - (i) the Club collected the information from the individual; and
 - (ii) the individual would reasonably expect the Club to use or disclose the information for that purpose; and
 - (iii) the Club provides a simple means by which the individual may easily request not to receive direct marketing communications from it; and
 - (iv) the individual has not made such a request to the Club.
- (c) Despite subclause (a), the Club may use or disclose personal information (other than sensitive information) about an individual for the purpose of direct marketing if:
 - (i) the Club collected the information from:
 - (i.1) the individual and the individual would not reasonably expect the Club to use or disclose the information for that purpose; or
 - (i.2) someone other than the individual; and
 - (ii) either:
 - (ii.1) the individual has consented to the use or disclosure of the information for that purpose; or
 - (ii.2) it is impracticable to obtain that consent; and
 - (iii) the Club provides a simple means by which the individual may easily request not to receive direct marketing communications from it, and
 - (iv) in each direct marketing communication with the individual:

(iv.1) the Club includes a prominent statement that the individual may make such a request; or

(iv.2) the Club otherwise draws the individual's attention to the fact that the individual may make such a request; and

(v) the individual has not made such a request to the Club.

Exception—sensitive information

(d) Despite subclause (a), the Club may use or disclose sensitive information about an individual for the purpose of direct marketing if the individual has consented to the use or disclosure of the information for that purpose.

Exception—contracted service providers

(e) Despite subclause (a), the Club may use or disclose personal information for the purpose of direct marketing if:

(i) the Club is a contracted service provider for a Commonwealth contract; and

(ii) the organisation collected the information for the purpose of meeting (directly or indirectly) an obligation under the contract; and

(iii) the use or disclosure is necessary to meet (directly or indirectly) such an obligation.

Individual may request not to receive direct marketing communications etc.

(f) If the Club (the first organisation) uses or discloses personal information about an individual:

(i) for the purpose of direct marketing by it; or

(ii) for the purpose of facilitating direct marketing by other organisations;

the individual may:

(iii) if paragraph (i) applies—request not to receive direct marketing communications from the Club; and

(iv) if paragraph (ii) applies—request the Club not to use or disclose the information for the purpose referred to in that paragraph; and

(v) request the Club to provide its source of the information.

(g) If an individual makes a request under subclause (f), the Club must not charge the individual for the making of, or to give effect to, the request and:

- (i) if the request is of a kind referred to in paragraph (f)(iii) or (iv)—the Club must give effect to the request within a reasonable period after the request is made; and
- (ii) if the request is of a kind referred to in paragraph (f)(v)—the Club must, within a reasonable period after the request is made, notify the individual of its source unless it is impracticable or unreasonable to do so.

Interaction with other legislation

(h) This principle does not apply to the extent that any of the following apply:

- (i) the *Do Not Call Register Act 2006*;
- (ii) the *Spam Act 2003*;
- (iii) any other Act of the Commonwealth, or a Norfolk Island enactment, prescribed by the regulations.

APP 8 - Cross-border disclosure of personal information

The Club will not disclose personal information to an overseas recipient.

APP 9 - Adoption, use or disclosure of government related identifiers

The Club will not adopt a government related identifier of an individual as its own identifier under any circumstances.

APP 10 - Quality of personal information

- (a) The Club will take such steps (if any) as are reasonable in the circumstances to ensure that the personal information that we collect is accurate, up to date and complete.
- (b) The Club will take such steps (if any) as are reasonable in the circumstances to ensure that the personal information that we use or disclose is, having regard to the purpose of the use or disclosure, accurate, up to date, complete and relevant.

APP 11 - Security of personal information

- (a) If the Club holds personal information, we will take such steps as are reasonable in the circumstances to protect the information:
 - (i) from misuse, interference and loss; and
 - (ii) from unauthorised access, modification or disclosure.
- (b) If:

- (i) the Club holds personal information about an individual; and
- (ii) we no longer need the information for any purpose for which the information may be used or disclosed by the entity; and
- (iii) the information is not contained in a Commonwealth record; and
- (iv) the entity is not required by or under an Australian law, or a court/tribunal order, to retain the information;

we will take such steps as are reasonable in the circumstances to destroy the information or to ensure that the information is de-identified.

APP 12 - Access to personal information

Upon request by an individual, we are required to give that individual access to his or her personal information, except to the extent that:

- 1 (a) the entity reasonably believes that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety; or
- (b) giving access would have an unreasonable impact on the privacy of other individuals; or
- (c) the request for access is frivolous or vexatious; or
- (d) the information relates to existing or anticipated legal proceedings between the entity and the individual, and would not be accessible by the process of discovery in those proceedings; or
- (e) giving access would reveal the intentions of the entity in relation to negotiations with the individual in such a way as to prejudice those negotiations; or
- (f) giving access would be unlawful; or
- (g) denying access is required or authorised by or under an Australian law or a court/ tribunal order; or
- (h) both of the following apply:
 - (i) the entity has reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to the entity's functions or activities has been, is being or may be engaged in;
 - (ii) giving access would be likely to prejudice the taking of appropriate action in relation to the matter; or

- (i) giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
- (j) giving access would reveal evaluative information generated within the entity in connection with a commercially sensitive decision-making process.

Dealing with requests for access

2. The Club must:

- (a) respond to the request for access to the personal information within a reasonable period after the request is made; and
- (b) give access to the information in the manner requested by the individual, if it is reasonable and practicable to do so.

APP 13 - Correction of personal information

(1) If:

- (a) the Club holds personal information about an individual; and
- (b) either:
 - (i) the Club is satisfied that, having regard to a purpose for which the information is held, the information is inaccurate, out of date, incomplete, irrelevant or misleading; or
 - (ii) the individual requests the Club to correct the information;

the Club must take such steps (if any) as are reasonable in the circumstances to correct that information to ensure that, having regard to the purpose for which it is held, the information is accurate, up to date, complete, relevant and not misleading.

Notification of correction to third parties

(2) If:

- (a) the Club corrects personal information about an individual that the Club previously disclosed to another APP entity; and
- (b) the individual requests the entity to notify the other APP entity of the correction;

the Club must take such steps (if any) as are reasonable in the circumstances to give that notification unless it is impracticable or unlawful to do so.

Refusal to correct information

(3) If the Club refuses to correct the personal information as requested by the individual, the Club must give the individual a written notice that sets out:

- (a) the reasons for the refusal except to the extent that it would be unreasonable to do so; and
- (b) the mechanisms available to complain about the refusal; and
- (c) any other matter prescribed by the regulations.

Request to associate a statement

(4) If:

- (a) the Club refuses to correct the personal information as requested by the individual; and
- (b) the individual requests the Club to associate with the information a statement that the information is inaccurate, out of date, incomplete, irrelevant or misleading;

the Club must take such steps as are reasonable in the circumstances to associate the statement in such a way that will make the statement apparent to users of the information.

Dealing with requests

(5) If a request is made under subclause (1) or (4), the Club:

- (a) must respond to the request within a reasonable period after the request is made; and
- (b) must not charge the individual for the making of the request, for correcting the personal information or for associating the statement with the personal information (as the case may be).

Contact us

For enquiries about this Policy please contact:

Human Resources Manager
Ingleburn RSL Club
70 Chester Road
INGLEBURN NSW 2565

For privacy complaints, please contact the Chief Operating Officer:

Mr Glenn Cushion
Chief Executive Officer
Ingleburn RSL Club
70 Chester Road
INGLEBURN NSW 2565