

## Privacy Policy

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Muswellbrook RSL Sub Branch Club Ltd ('Club', 'we', 'us') aims to protect the privacy of the personal information that we collect and hold whilst carrying out our activities. 'Personal information' in this policy means information or an opinion that is capable of identifying a person, as defined in the *Privacy Act 1988* (Cth) (**Privacy Act**).

This policy has been developed as part of the Club's efforts to comply with its obligations under the Australian Privacy Principles (**APPs**) established under the Privacy Act, and applies to personal information collected from and about staff, members, guests, other customers, suppliers and any other person whose personal information the Club may collect from time to time. As the APPs do not apply to employee records, 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. Also, this policy does not form part of any contract. The Club may update this policy whenever we consider appropriate.

### **1 What types of personal information do we collect?**

The Club aims only to collect personal information that is reasonably necessary for our activities. The types of personal information that we collect will depend on the nature of the interaction between you and the Club, and where and how we collect the information. Sometimes, if you do not provide us with the information that we request, we may not be able to do business with you. For example, the Club is unable to admit you as a member unless you provide the information required by law.

#### ***Members, guests and other customers***

The Club may collect personal information from Club members and their guests, and other customers (such as people attending club functions) including name, address, occupation, proof of age, other contact details, and the extent of your use of (and preferences in relation to) products and services offered by, or available from, the Club.

You may be required to produce a recognised form of identification such as your membership card or proof of age, to gain entry to the Club's premises. The Club uses terminals to gather this information, but scanning of your identification is optional and you may sign in manually once your identification has been sighted by Club staff.

#### ***Job applicants, staff, contractors, suppliers and volunteers***

The Club collects personal information about job applicants, staff, volunteers who work with us, and details of other people who come into contact with the Club such as contractors and suppliers.

#### ***Motel guests***

The Club also collects information from motel guests such as your name, address, other contact details, and booking information.

#### ***Sensitive Information***

Some of the information the Club collects is 'sensitive information' (as defined under the Privacy Act), such as information about your health. The Act requires the Club only to collect sensitive information:

- from you where you consent and it is reasonably necessary for our activities;
- if the collection is required by law or a court or tribunal order; or

- if it relates to our Club activities and you are a Club member or have regular contact with us in connection with our activities.

## **2 How do we collect your personal information?**

The Club will usually collect personal information directly from you, for example when you correspond with us by e-mail or in writing, deal with us over the telephone or in person, or use our facilities or our services or swipe your membership card in a gaming terminal. The Club collects CCTV footage in some areas of its premises for security purposes.

When you visit our website, the server records your visit and logs general information such as your IP address, search terms, your operating system and browser software, and the data downloaded (such as web pages or document files). This information does not identify the user personally. Our website may include links to other organisations. We are not responsible for linked websites, so before you disclose your personal information to any linked website you should check their privacy policy.

Sometimes, someone else may provide us with personal information about you, with or without your direct involvement. For example, we might collect personal information from a local liquor accord, a regulatory authority, or another industry organisation (such as ClubsNSW), another organisation of which you are a member (such as a community group which uses our facilities or the RSL Sub branch), or from a representative of yours.

## **3 How do we use your personal information?**

### ***Information of members, guests and other customers***

The purposes for which the Club collects and uses the information of its members, guests and other customers include:

- to process membership applications and renewals, and, to admit you to our premises;
- to provide you with services and/or products;
- to communicate with you and to answer enquiries;
- to provide information about other activities, products or services the Club considers would interest you (which you can tell the Club not to do at any time);
- to help the Club to properly operate its business, for example to improve our products or services, for security purposes, to train staff, or to undertake marketing activities; and
- to comply with our legal obligations (such as liquor & gaming laws).

If we collect your personal information for another purpose, we will generally let you know at the time we collect the information.

### ***Information of job applicants, staff members and contractors***

The Club collects and uses personal information of job applicants, staff and contractors for the primary purpose of assessing and (if successful) engaging or employing the person. The other purposes for which the Club uses such personal information include managing your employment or engagement, for insurance purposes, and, to satisfy our legal obligations.

### ***Information of motel guests***

The Club collects and uses the personal information of motel guests to manage your bookings, to provide you with our products and services, and to help us properly operate the business (for example to improve our products or services, for security purposes, to train our staff, or to undertake marketing activities).

### ***Information of volunteers***

The Club also uses personal information about volunteers to enable them to work with us.

#### **4 When will we disclose your personal information to others?**

The Club aims to confine its disclosure of personal information to the primary purpose for which it has been collected, or for a related purpose. This means the Club will usually only disclose personal information in connection with our business (including our motel business), our administrative functions, and our registered club community, social, and recreational activities. This includes when necessary to provide you with a product/service, to help us in running the Club, and to comply with our legal obligations.

Sometimes the Club may disclose your personal information outside the Club for the purpose for which the information was collected or for a related purpose. For example, we may provide your personal information to:

- outsourced service providers who perform functions on our behalf or provide services to us (such as security services, market research, mail handling services, and professional advice to the Club) or who sell products or provide services on our behalf;
- anyone authorised by you to receive your personal information (your consent may be express or implied and can be withdrawn at any time);
- an actual or prospective amalgamation partner if we engage in an amalgamation with another registered club, or, an actual or prospective purchaser if we sell any part of our business which is not a registered club operation; and
- anyone to whom we are required or authorised by law to disclose personal information.

We disclose your personal information to third parties on the basis that they agree with us to only use your personal information for the purpose for which it was provided and to protect the privacy of your personal information (except where we are authorised or required by law to disclose the information).

The Club may also share your personal information, including sensitive information, with a third party if the Club has a belief that its use and/or disclosure is necessary:

- to lessen or prevent threats to health, life or safety of any individual;
- to investigate unlawful activity or serious misconduct within the Club;
- 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.

#### ***Consent***

You consent to us disclosing your personal information to the third parties referred to above, and similar organisations, who may in turn provide your information to others (for example, for marketing purposes). 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). However, if you do not permit the disclosure of some personal information as the Club requests, then the Club may not be able to meet its legal obligations and may not be able to do business with you. If this is the case, we will let you know.

## ***Sending information overseas***

The Club is not likely to send your personal information outside Australia.

## **5 How we hold your personal information**

The Club has security systems in place which are intended to protect your personal information from misuse, loss, unauthorised access, modification or disclosure by the use of various methods including secure storage of confidential paper records and password access rights to computerised records.

If the Club receives personal information about you which it did not request and which it does not reasonably require, the Club may destroy or de-identify this information where appropriate.

If you reasonably believe that there has been an unauthorised use or disclosure of your personal information, please contact us promptly.

## **6 Updating your personal information**

The Club aims to keep all personal information that we hold accurate, complete and up-to-date. Please contact Club Reception if you need to change your contact details. Any other requests may be made to the Club's Chief Executive Officer. We will take reasonable steps to correct Club records appropriately and within a reasonable time frame except where the Privacy Act prohibits it or does not require it.

The Club is required by law to keep some types of information for certain periods of time. If we no longer require your personal information, we will generally destroy or de-identify that information. The Club reserves the right to retain information for a period longer if the Club considers that it is necessary, and as long as it is in accordance with the APPs.

## **7 Accessing your personal information**

Under the Privacy Act an individual generally has the right to obtain access to any personal information which the Club holds about him/her and to advise the Club of any perceived inaccuracy in that information. However, in some circumstances the Privacy Act entitles the Club to deny access, for example if providing access would impact unreasonably on the privacy of others. If we do refuse access, we will generally let you know the reasons.

If you request access to your personal information, we may ask you to verify your identity and specify the information you require. The Club may charge a fee to cover our costs of locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, the Club will generally advise the likely cost in advance. To make a request to access any personal information that the Club holds about you, please contact us.

## **8 Questions or complaints**

If you have a question about privacy, or a complaint about the Club's compliance with the APPs, please contact the Chief Executive Officer in writing. The Chief Executive Officer, or an authorised delegate, will investigate your complaint and respond to you within a reasonable period, depending on the nature of your complaint. If you are not happy with the Club's response, you may contact the Office of the Australian Information Commissioner.

## **9 Contact us**

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