



PRIVACY POLICY - GENERAL

Updated: November 2020

Prepared by:

Effective Workplace Solutions

1. Overview

Woodburn Evans Head RSL's Privacy Policy aims to promote responsible and transparent handling of personal information and assist in meeting the obligations of the *Privacy Act 1988 (Commonwealth)* and *Australian Privacy Principles (APPs)*. Woodburn Evans Head RSL is committed to safeguarding the personal information it collects. This policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.

2. Commencement date

This policy will commence from 1 December 2019. It replaces all other policies in relation to Privacy (whether written or not).

3. Scope

This document is a company policy of Woodburn Evans Head RSL. It applies to all Woodburn Evans Head RSL employees. If clarification of the application of this policy is required, please contact the Operations Manager.

4. Policy

Companies with an annual turnover of \$3 million or more, or with obligations under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006*, have obligations under the *Privacy Act 1988* to uphold the *Australian Privacy Principles (APPs)*.

To ensure Woodburn Evans Head RSL meets its compliance responsibilities this policy aims to ensure we abide by our privacy obligations in a consistent manner.

The policy contains the following information:

- (a) The kinds of personal information the Club collects and holds;
- (b) How the Club collects and holds personal information;
- (c) The purposes for which the Club collects, holds, uses and discloses personal information;
- (d) How a person may access personal information held about them and ask for correction of their personal information;
- (e) How a person may complain about a breach of the APPs and how the Club will deal with such complaints.

a. Rationale

Personal information is information or an opinion that identifies an individual. Examples of personal information we collect include: names, addresses, email addresses, and phone .

Personal Information is obtained in many ways including by correspondence, telephone, email, via our website, from media and publications, from other publicly available sources, from cookies, when you complete a membership application form, and from third parties. We don't guarantee website links or policy of authorised third parties.

In general, we attempt to limit the collection of sensitive information we collect from you; however, we may be required to collect sensitive information from you in order to carry out the services provided to you. We will not collect sensitive information from you without your knowledge or consent.

Woodburn Evans Head RSL recognises that the personal information of members and should only be used for the purpose it was collected. Although the APPs provide for the ability of people to act anonymously or use pseudonyms, there will be times when we are legally required to collect personal information directly from you. Where we are required by law to collect information from you, we will notify you at the time, or as soon as practicable, to ensure that you are aware of such collection and its purpose. Where unsolicited personal information is received by the Club, it will be afforded the same privacy protection as solicited personal information. Woodburn Evans Head RSL will apply procedures to determine whether it could have collected the information under the provisions of the APP's and take reasonable steps to notify individuals that it has collected personal information from someone other than the individual.

b. Privacy

Woodburn Evans Head RSL is committed to providing you with the highest levels of customer service. This includes protecting your privacy and keeping you informed of our privacy policy.

Woodburn Evans Head RSL is a registered Club under the *Registered Clubs Act 1976 (NSW)*. Woodburn Evans Head RSL is required to comply with the provisions of the *Privacy Act 1998* which regulates, among other things, the collection, storage, quality, use and disclosure of personal information.

The principal activities of Woodburn Evans Head RSL 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 goods and services; and
- Providing a safe and friendly environment for locals to meet.

c. Collection

The kinds of personal information Woodburn Evans Head RSL collects and holds

Woodburn Evans Head RSL will only collect and hold personal information that is necessary for one or more of its functions or activities and will collect personal information only by lawful or fair means and not in an unreasonably intrusive way.

Woodburn Evans Head RSL collects your personal Information for the primary purpose of providing our services to you and marketing. The type of information the Club collects includes personal information from members such as: name, address, occupation, date of birth, proof of identity, contact details, transaction history and, in some cases, credit card and bank account details and the extent of your use of,

and purchase of, goods and services offered by, or available at or from the Club. We collect your details as required as part of your membership or visitation, including but not limited to the information required under the members' and visitors' registers, photographs or video footage taken at our premises. Also, if you access the Club website, the information we collect includes your IP address, type of operating system, type of browser you operate and the area generally where you are located when accessing the website.

How Woodburn Evans Head RSL collects and holds personal information

Woodburn Evans Head RSL collects this information from you by various means including, without limitation, by you completing your membership application or renewal form, by you entering the Club as a temporary member or guest of a member via our electronic sign-in system, by you completing entries into competitions and promotions and automatically when you access the Club website. If you do not provide the required mandatory information, we may be unable to provide our services to you.

We are required to take steps to help keep your personal information safe. We aim to take reasonable steps to:

- (a) Make sure the personal information we collect, use or disclose is accurate, complete and up to date;
- (b) Keep your personal information secure within our computer system and where your personal information has been provided in hard copy format. This information is either destroyed when no longer required, held securely on a Woodburn Evans Head RSL site, held securely within the control of our Sub-Club representatives or held securely in off-site storage;
- (c) Protect your personal information from misuse, loss, unauthorised access, modification or disclosure both physically and through computer security methods.

Storage

Personal information is stored and archived for a period of seven (7) years. This includes information about non-members and Internet site transmission logs.

The purposes for which Woodburn Evans Head RSL collects, hold, uses or discloses personal information

Woodburn Evans Head RSL collects this information in order to:

- (a) Identify you and process your membership application;
- (b) Meet statutory requirements under the *Registered Clubs Act*, *Anti-Money Laundering and Counter-Terrorism Financing* laws and other relevant legislation;
- (c) Contact members to advertise and market events, activities, opportunities, offers and the goods and services provided by Woodburn Evans Head RSL or companies in which Woodburn Evans Head RSL has an ownership interest (including by direct mail, telephone, SMS and MMS) including without limitation, with respect to food and beverage, promotions, entertainment, wagering, gaming machines, sporting events and venue hire;
- (d) Analyse usage of services offered by Woodburn Evans Head RSL;

- (e) Provide you with goods or services you are receiving or utilising as offered by Woodburn Evans Head RSL and to offer and administer any benefits you subsequently become entitled to in relation to that product or service;
- (f) Share your information with companies in which Woodburn Evans Head RSL has ownership or interest for the purpose of them marketing their products to you;
- (g) Analyse web usage.

Woodburn Evans Head RSL will only use your personal information for the purpose for which you have provided it, e.g. for the application of Club membership or to gain entry to the Club premises as a visitor or guest or for other uses as permitted by the *Privacy Act* or uses for which you have consented to having your personal information used for.

When or before the Club collects personal information, the Club will take responsible steps to inform the individual providing the information of:

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

Woodburn Evans Head RSL will be unable to allow you to join the Club or to be a temporary member unless you have provided us with the required personal information. Woodburn Evans Head RSL will also be unable to provide you with certain goods and services or to join a Sub-Club, unless you have first provided the Club with the required personal information.

Woodburn Evans Head RSL may disclose your information to third parties that provide services under contract to the Club. These contracts require the third party to keep your personal information confidential and secure.

From time to time, Woodburn Evans Head RSL may wish to carry out a voluntary survey for feedback. Before collecting survey results, the Club will advise you of the purpose of the survey e.g to gain information for the Club to improve services etc.

Visitors and guests

Under the *Registered Clubs Act*, patrons visiting Woodburn Evans Head RSL must produce a recognised form of identification i.e. passport, driver's licence or proof-of-age card to gain entry into the premises. Woodburn Evans Head RSL uses terminals to gather this information and to protect the data collected i.e. addresses of patrons. Scanning of licences is optional, and if preferred, the 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.

Surveillance of venue

Woodburn Evans Head RSL is subject to video surveillance for security reasons. Details of suspected or actual illegal and/or undesirable activities on our premises may be shared with other clubs, law enforcement and regulatory bodies such as Liquor & Gaming NSW and the Independent Liquor and Gaming Authority.

Cross-border disclosure

Woodburn Evans Head RSL does not transmit personal information across border. As far as Woodburn Evans Head RSL is aware, none of its contractors transmit or store data across border.

Woodburn Evans Head RSL is not likely to disclose information to overseas recipients; however, understands that the APP's place an obligations on us to ensure that the overseas recipient does not breach the APP's.

Access and correction

Woodburn Evans Head RSL relies on the information provided by members to be accurate and current. The Club will take reasonable steps to ensure that the personal information it collects, uses or discloses is accurate, complete and up-to-date. If you believe that the personal information we hold on you is incorrect, please advise us in writing, sending your letter or email to the Privacy Officer using the details at clause 4.2.7 of this policy. 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 *Privacy Act* allows individuals to access and alter records containing their personal information, subject to certain exceptions. If you wish to access the personal information the Club holds about you, please provide a written request to the Privacy Officer using the details at clause 4.2.7 of this policy. The Club will provide you access to your information except where the *Privacy Act* prohibits it or does not require it.

To change your name on the membership database supporting documentation from a Government source is required. Change of addresses can be done by completing an 'Update Your Details' form, by letter or by use over the internet. Woodburn Evans Head RSL does not use government-related identifiers.

It is important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up to date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

Woodburn Evans Head RSL will not charge any fee for your access request but may charge an administrative fee for providing a copy of your Personal Information. In order to protect your Personal Information we may require identification from you before releasing the requested information.

Complaints

Woodburn Evans Head RSL will take complaints about a breach of privacy seriously. If you believe that we have breached your privacy or if you wish to make a complaint about the Club's use of your personal information please:

- Put your complaint in writing;
- Provide as much detail as possible; and
- Forward the complaint by mail or email to the Privacy Officer (details below).

The Privacy Officer will investigate the complaint and provide you with a written response following the completion of the investigation.

5. Privacy officer

Further information on Privacy can be obtained by using the contact details below:

The Operations Manager
Woodburn Evans Head RSL
1-13 McDonald Place,
Evans Head NSW 2473

p: 02 6682 4282

e: admin@clubevans.com.au

6. Policy compliance and availability

Policy compliance will be facilitated through education, publicity, widespread promotion and reiteration of the policy.

This policy or an approved form thereof will be displayed and maintained on Woodburn Evans Head RSL website and made available free of charge upon request.

7. Variations

Woodburn Evans Head RSL *reserves the right to vary, replace or terminate this policy as required.*

Policy version and revision information

Policy authorised by: Operations Manager

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