

## CUSTOMER PRIVACY POLICY

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### PURPOSE

Club Toukley 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.

Privacy Law reforms to the Privacy Act 1998 (“Privacy Act”) commenced on the 12<sup>th</sup> March 2014.

Every member or guest, to be eligible for entry to the Club, has submitted personal information about him/herself.

This policy describes how we handle personal information collected from members, guests and others.

Personal information means information or an opinion about an individual (who can reasonably be identified), whether the information or opinion is true or not, and whether the information or opinion is recorded in material form or not.

### CUSTOMER PRIVACY

It is a part of Club Toukley RSL’s core values that we will properly value and protect any information entrusted to us about our customers. This policy describes how we will safeguard personal and Club information, to ensure peace of mind when dealing with our Club.

We are committed to complying with our obligations under the *Privacy Act* by protecting the privacy and confidentiality of your personal information and the personal information of all our members, guests and others.

When we collect, use disclose, store, access or correct your personal information, our actions will comply with the *Privacy Act* and the *Australian Privacy Principles*.

Where appropriate, we will handle personal information relying on the employee records exemption and the related corporate exemption in the *Privacy Act*.

### WHAT KINDS OF PERSONAL INFORMATION DOES THE CLUB COLLECT AND HOLD?

We collect a wide range of personal information, and in some cases sensitive information, this includes:

- A photo of you for your membership card;
- Your contact details including your occupation, date of birth and signature;
- An image of your driver’s license or other identification if you choose to scan your ID when entering the Club (all visitors to the Club have the option not to have their identification scanned);
- Details of your membership of the Club including any positions held by you at the Club or any complaints made by you or against you;
- Information about what goods or services you buy or receive from us including whenever you use your membership card;

- Details of your activities in the Club including your participation in social or sporting activities or your involvement with our sub-clubs;
- Health information including any medical conditions you may give to us to enable us to provide our facilities or services;
- Information connected to your use of our gaming machines (including your player activity statements and prizes you receive);
- Information about you related to a liquor or gaming self-exclusion or banning order about you from yourself, other clubs, ClubsNSW, a Liquor Accord or the Independent Liquor and Gaming Authority.
- Things you say or do (or said about you) in connection with an incident or potential disciplinary proceedings;
- Your IP address and pages accessed on our website;
- Images or video and audio recording of you at our premises; and
- If you apply for a job with us, the information in your resume and other information that you or your referees provide to us, including notes of our interactions with you and/or others in relation to your prospective employment.

From time to time, we may collect additional information related to surveys, specific promotions, services or activities. Wherever practicable, we will advise you of the information being collected and provide you with an opportunity to refuse the collection of information.

#### **HOW DO WE COLLECT YOUR PERSONAL INFORMATION?**

Your personal information is collected as a result of your visits to (or dealings with) the Club. Information is collected by recording information that you provide to us, by electronic means and by the observations of our staff. We collect personal information when you:

- Visit the Club;
- Apply for, or renew, membership of the Club or request to use our services;
- Purchase goods or services from us (and for example, use your membership card);
- Use our gaming machines or request to be excluded from using our gaming machines;
- Attend a function or show at the Club;
- Plan a function to be held at the Club;
- Participate in the activities offered by the Club including raffles, competitions and promotions;
- Visit our website or one of the social media sites used by the Club;
- Are banned or removed from the Club or the gaming area;
- Use your Club membership card or another card issued by the Club in the Club;
- Receive or request sponsorship through programs such as Club Grants;
- Are involved, witness or are connected to an incident at the Club or disciplinary proceedings of the Club; and/or
- Obtain, apply for, or renew membership of a sub-club of the Club or participate in the activities of a sub-club of the Club.

In general, if you contact us, we may keep a record of that correspondence.

We only collect personal information about you from you unless it is unreasonable or impractical to do so. For example, it may be unreasonable or impractical to collect information from you when the information is provided by other members, our staff or the police.

### **WILL I BE NOTIFIED THAT MY PERSONAL INFORMATION IS BEING COLLECTED?**

When we collect information from you we will take reasonable steps to notify you (or otherwise ensure that you are aware) of the following:

- Our identity and contact details;
- The facts and circumstances of the collection;
- Details of any law that require or authorize the collection;
- The purposes of collection;
- The consequences if we do not collect the information;
- That this policy contains information about how you can access or correct your information or make a complaint about the Club; and
- Whether we are likely to disclose the information overseas (and if so to which countries).

One way we notify you of the above is by making you aware of this policy.

If you give us personal information about others we ask that you tell them about this privacy policy.

### **IS THE CLUB REQUIRED BY LAW TO COLLECT PERSONAL INFORMATION?**

As a registered club, we have a legal responsibility to collect certain information about our members and guests pursuant to: the *Registered Clubs Act*, the *Corporations Act*, *Gaming Machines Act*, *Liquor Act*, *Anti-Money Laundering and Counter-Terrorism Financing Act* and *Work Health and Safety Act*.

For example, when a person applies for membership of the Club we must collect details including their name and address. We must display this information on the Club's notice board before the Board is able to consider the application for membership. We may also need to provide this information to other members if a request is made under the *Corporations Act*.

Temporary members, guests of members and other visitors to the Club may be required to produce a recognised form of identification (such as a driver's license or passport) to gain entry into the licensed premises. If you elect to use our electronic ID scanner, we collect information from your ID at the time you enter the Club. More information about our electronic ID scanners appears below.

### **FOR WHAT PURPOSES DOES THE CLUB COLLECT, HOLD, USE AND DISCLOSE YOUR PERSONAL INFORMATION?**

We collect, hold, use and disclose personal information to operate the Club, carry out certain activities, provide products and services to members and guests and other members of the public to comply with our legal obligations. The purpose of collecting personal information is to:

- Consider applications and renewals of membership;
- Identify who comes into the Club and verify their age and address;

- Create registers as required by the Corporations Act and the Registered Clubs Act;
- Provide a safe environment for you, other members and guests and our staff;
- Provide services to members and their guests;
- Carry out accounting and finance requirements and legal and administrative reporting requirements;
- Operate functions at the Club;
- Carry out competitions and promotions;
- Perform gaming operations;
- Publish and distribute newsletters;
- Carry out marketing (including direct marketing);
- Offer and manage sponsorships including by supporting community sports and social events;
- Operate and support sub-clubs of the Club including publishing contact details of committee members;
- Conduct elections of the Board;
- Conduct disciplinary proceedings;
- Resolve a complaint;
- Access an applicant's suitability for employment; and
- Improve our services and increase membership of the Club.

#### **WHAT HAPPENS IF YOU DON'T PROVIDE YOUR PERSONAL INFORMATION?**

If you don't give us your personal information you may not be able to become a member of the Club or use the Club's services or facilities.

You have the option of not identifying yourself or using a synonym when dealing with us. However, this will be limited to enquiries of a very general nature and usually only over the telephone or by email. In most circumstances you will be unable to deal with the Club anonymously or with a pseudonym because of our obligations under the *Registered Clubs Act*.

#### **HOW DO WE USE YOUR PERSONAL INFORMATION**

We use your personal information primarily to allow us to carry out the activities and functions listed above. We also use your personal information for secondary purposes related to those activities or when allowed under the *Privacy Act*.

The Club may also use the personal information we collect from you for direct marketing of products and services to you including from third party suppliers. Such products and services may include the provision of newsletters, competitions, announcements, campaigns or information about entertainment at the Club or services offered by the Club.

You can refuse any direct marketing by advising the Club.

#### **DOES THE CLUB DISCLOSE MY PERSONAL INFORMATION TO OTHERS?**

There may be times when we need to disclose your personal information to third parties including our insurers, ClubsNSW, a Club sponsor, our legal or financial advisers or to other Club members. Personal

information will only be disclosed to these parties for a purpose permitted by the *Privacy Act* and/or this policy and your consent will first be obtained where appropriate.

We may need to disclose your personal information to third parties for the purposes of allowing us to carry out the activities listed above. For example, from time to time, we engage external companies to send direct marketing emails and SMS, carry out mail services, IT storage services and software related services. These external companies only have access to the information necessary to provide services to the Club. They are required to comply with the *Privacy Act* and must offer privacy standards comparable to those offered by us.

We will disclose your personal information if we are required or authorized to do so by law enforcement agencies, the Australian Electoral Office, the Department of Family Services or the Australian Taxation Office.

## FREQUENTLY ASKED QUESTIONS

**Is there surveillance at the Club?** The venue operated by the Club is subject to video and audio surveillance for security reasons including to monitor the safety of members, guests and employees and to protect our assets. The footage and audio recordings may be used in disciplinary proceedings and/or to investigate incidents and may be disclosed to our legal representatives, our insurers and law enforcement agencies.

**Do I have to use the electronic ID scanner to enter the Club?** No. You are not in any way obliged to scan your identification. If you prefer you can simply manually enter your name, address and signature (as required by the *Registered Clubs Act*) into the terminal and present your identification to staff who will confirm your details.

**What information is collected by the electronic ID scanners?** Our electronic scanner used by the Club retains a full copy of your ID which means that the Club collects all the information recorded on your ID (which may include sensitive information). This information is retained for three years to comply with our obligations under the *Registered Clubs Act*.

Our electronic ID scanners store data in a password protected encrypted database.

**Why does the Club use ID scanners?** Under the *Registered Clubs Act*, we are required to maintain records of the name, address and signature of temporary members and guests over the age of 18. Previously, we provided paper registers that needed to be filled out by hand which was slow, cumbersome and wasted paper.

The Club now offers scanning terminals which are quicker and more efficient for temporary members and guests who want to enjoy the facilities of the Club but do not want to manually write in their details.

Scanners are a secure way of holding information and also help provide a safe environment for you, other patrons and our staff. The information collected may be passed onto the police or ILGA to assist in any investigation.

Scanners are also environmentally friendly in that they have helped the Club reduce its paper usage and storage.

The collection of personal and sensitive information of the individuals who choose to scan their identification is reasonably necessary for the activities and functions of the Club.

**How do we hold and protect your personal information?** Personal information that is held by us is stored both electronically and by hard copy. We take reasonable steps to ensure that your personal information is safe and secure by unauthorized use and disclosure.

Information that is stored electronically or on our servers is restricted, password protected and only accessible to relevant employees.

Video surveillance is stored on our digital recorders which are maintained in a restricted access area and password protected.

Your personal information is securely destroyed when it is no longer needed or when it is out of date.

**Are we likely to disclose personal information overseas?** It is unlikely that we will disclose your personal information overseas. However, if you agree to information being put on our websites then this could be accessed by anyone in Australia and by persons in other countries.

**Using the Club's website and social media:** The website and social media sites operated by us may collect personal information for the purposes outlined in this privacy policy. They may also use cookies.

Any information collected as a result of your use of the website or social media platforms operated by us will be handled in accordance with this privacy policy. The website and social media sites operated by us may contain hyperlinks to other websites including those operated by third parties. The links provided are for reference only. We do not have any control over these external websites. We are not responsible for the content on these sites or the privacy practices adopted by these sites.

**What does this policy mean?** By attending the Club or participating in an activity with us, you consent to the terms of this policy. From time to time, your additional consent will be sought for the collection, use or disclosure of information for purposes other than as set out in this policy.

If you do not agree to any part of this policy or do not wish to receive direct marketing information, please contact the Club.

**How do I access, update or correct the personal information held by the Club about me?** You can request the personal information we hold about you by contacting the Club. We will not charge you for making the request. However, we may need to charge you for our time to answer your request. We will advise you in advance if there are to be any charges associated with complying with your request.

We will respond to your request within a reasonable timeframe (usually not more than 30 days). When you request access we may need further information from you to verify your identity.

There are a number of reasons why we may be unable to give you access to your information. If we are not able to provide access to your information we will provide you with our written reasons.

If you believe that the personal information that we hold about you is incorrect you can ask us to correct it. If asked to correct your personal information we will take reasonable steps to correct the information to ensure that it is accurate, up to date, relevant and not misleading. If we refuse to correct your personal information we will give you written reasons.

## MAKING A COMPLAINT

If you believe we have breached the *Privacy Act* or any of the *Australian Privacy Principles* or if you want to raise any issues you may have about privacy at the Club please contact the General Manager.

You can contact the General Manager by:

Phone: (02) 4396 4855  
Email: [admin@toukleyrsl.com.au](mailto:admin@toukleyrsl.com.au)  
Post: PO Box 22, Toukley, NSW 2263

In making a complaint to the Club about privacy, please give us enough details to be able to identify your concerns and respond appropriately. You must provide us with your name and contact details and a description of your complaint. We will respond to you in a reasonable timeframe (usually not more than 30 days). If you are unhappy with how we handle the complaint you have a right to take the complaint to the Information Commissioner.

Office of Australian Information Commissioner contact details:

Phone: 1300 363 992  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)  
Post: GPO Box 5218 Sydney 2001