

# PRIVACY POLICY

Cabramatta Bowling & Recreation 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 about an identified person, or a person who is reasonably identifiable, whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not, 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.

By visiting our website at <https://www.cabrabowls.com.au> (Website), attending our premises, using our goods and/or services or by otherwise providing your personal information to us, you confirm your acceptance of the terms of this policy and consent to the handling of your personal information as set out in this policy. If you do not agree with the terms of this policy, please do not attend the Club's premises, use or products, services, Website or otherwise provide us with your personal information.

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

As a registered club, we aim 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. You have the option of not identifying yourself or using a pseudonym 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. You may also be able to visit our Website anonymously. In most circumstances, you will be unable to deal with the Club anonymously or with a pseudonym because of our obligations under liquor and gaming law.

### 1.1 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, residential or mailing address, email address, occupation, date of birth, proof of age, other contact details, gender, IP address 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.

## ***1.2 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 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 of such persons to meet its legal obligations.

## ***1.3 Sensitive Information***

Some of the information the Club collects is 'sensitive information' (a subset of personal information that is 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; or
- if the collection falls under one of the established categories under the Privacy Act (for example, if the collection is required by law or a court or tribunal order, or if the collection relates to our Club activities and you are a Club member or have regular contact with us in connection with our activities).

## **2 Purpose of collecting your personal information**

In general, we collect personal information so that we can perform our business activities and functions and to provide best possible quality of customer service.

We will collect, hold and use your personal information to undertake one or more of the following functions:

- to process membership applications and renewals, and, to identify you and admit you to our premises;
- to provide you with services and/or products and to administer any benefits to which you may become entitled;
- to communicate with you and to answer enquiries;
- to establish and manage 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 (if any), (including by direct mail, telephone, email, SMS and MMS), and to register you for such events, promotions, competitions, activities and offers;
- 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, and AML/CTF laws).

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

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

Where possible, we will collect your personal information from you in a number of ways.

The Club collects personal information when, for example, you:

- enter, visit or deal with the Club;
- apply for, or renew, membership of the Club or request to use our services;
- purchase goods or services from us;
- use your Club membership card or any other card issued by the Club;
- use a credit card or EFTPOS card for purchases;
- using the Website or any of the Club's social media sites;
- participate in activities offered by the Club including raffles, competitions and promotions;
- access or use our on-premises Wi-Fi from any of your personal devices; and
- dealing with us (in writing, by telephone, by email or in person).

The Club also 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, the Police a regulatory authority, or another industry organisation (such as ClubsNSW or Bowls NSW), another organisation of which you are a member (such as a community group which uses our facilities), another member of the Club or from a representative of yours.

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

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

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 permitted under the Privacy Act.

The Club may also use the personal information we collect from you for direct marketing (e.g. via direct mail, telephone, email or SMS) 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 always have the option of opting out of receiving any direct marketing by contacting us.

#### ***4.2 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.

### 4.3 Information of volunteers

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

### 5 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, 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:

- employees, third party service and content providers, dealers and agents, contractors and advisors, in order to provide products and/or services to you or to market their products and/or services to you;
- 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.

### 5.1 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. For example, there is certain information that we must send members of the Club, such as a notice of general meeting – you cannot opt out of receiving this information.

## **5.2 Sending information overseas**

Generally, the Club will not disclose personal information to overseas recipients except with your consent or where we are required or authorised to do so by law.

If you agree to information being put on our Website then this could be accessed by anyone in Australia and by persons in other countries.

## **6 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.

Your personal information is held securely on our on-site and off-site servers and is restricted, password protected and only accessible to relevant employees and third-party IT service providers.

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

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.

## **7 Data breach**

If a data breach or suspected data breach occurs, we will undertake a prompt investigation, which will include an assessment of whether the incident is likely to result in serious harm to any individuals. In such a situation we will comply with the requirements of the Privacy Act which may require notification to the Office of the Australian Information Commissioner (OAIC), the Police and affected individuals. Please contact us if you have reason to believe or suspect that a data breach may have occurred, so that we can investigate and, if necessary, undertake appropriate containment, risk-mitigation and notification activities as required.

## **8 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. You may lodge a request to correct personal information that we hold about you if you believe it is inaccurate, incomplete, out-of-date, irrelevant or misleading, in which case please contact the Club. This can be done via the reception front desk, via mail or email, or by contacting the Chief Executive Officer. We will deal with your request in accordance with the Privacy Act. 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.

## **9 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. We will provide you with access to the information requested within a reasonable period after the request is made, usually not exceeding 30 days. The Club may charge a reasonable 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.

## **10 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.

## **11 Contact us**

Jay Porter  
Group CEO  
82 Longfield Street  
Cabramatta NSW 2166  
P: 02 9728 4344  
E: [info@cabrabowls.com.au](mailto:info@cabrabowls.com.au)