

Tewantin Noosa RSL & Citizens Memorial Club Incorporated Privacy Policy: as at March 2014

Introduction

The Tewantin Noosa RSL & Citizens' Memorial Club Inc (The Club) is a registered club representing its membership. The Club collects personal information in order to conduct its business of Membership. The Club operates in the Returned Servicemen, social and beneficiary spheres.

The Club is committed to protecting your privacy and providing you with information and services relevant to you. The Club complies with the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**). This Privacy Policy (**Policy**) should be read in conjunction with the Privacy Act and the APPs.

How this Policy applies

This Policy applies to personal information the Club collects from you:

- via our website;
- via social media;
- via telephone;
- via email;
- via fax;
- in person; and/or
- in writing;

Club website(s)

The Club collects two types of information. The first type is anonymous information. The web server makes a record of your visit and logs the following information for statistical purposes:

- the user's server address;
- the user's top level domain name (e.g. com, .gov, .net, .au, etc.);
- the date and time of the visit to the site;
- the pages accessed and documents downloaded;
- the previous site visited; and
- the type of browser used.

No attempt will be made to identify users or their browsing activities except, in the unlikely event of an investigation, where a law enforcement agency may exercise a warrant to inspect the internet service provider's logs.

Another way information may be collected is through the use of "cookies". A cookie is a small text file that the website may place on your computer. Cookies may be used, among other things, to track the pages you have visited, to remember your preferences and to store personal information about you.

The Club website uses cookies for "Session Management" to maintain data related to the user during navigation to make it easier for you when logging in to register for update Membership data.

The Club website DOES NOT use Cookies for user tracking.

You can adjust your Internet browser to disable cookies or to warn you when cookies are being used. However, if you disable cookies, you may not be able to access certain areas of the Website or take advantage of the improved web site experience that cookies offer.

Our websites may contain links to other websites, web based third party event booking facilities, and social media pages including Facebook, Twitter and LinkedIn or Youtube. We are not responsible for the privacy policies of the entities responsible for those websites and we recommend that you review the privacy policies applicable to any other websites you visit.

Our website also requires you to provide information to register and pay for membership and entertainment. This also includes details for invoicing and for credit card payment where applicable. The Club does not store credit card details.

The kinds of information the Club may collect

From time to time you may voluntarily supply your personal information to the Club. The Club will record your e-mail address if you send us a message, subscribe to an email newsletter, or complete a form if this information is requested.

When you provide your personal information, it allows us, for example, assist you with membership, entertainment, menu, associated Club i.e. Bowls, Golf, Dart activities. You may supply personal information to the Club to, for example, receive Club entertainment information, to take part in promotions or competitions, events, and to receive sponsorships or donations as part of the Club's Community Support commitment. The Club only collects personal information that is necessary for the Club to perform its functions and/or activities.

Depending upon the circumstances you may provide to the Club, the Club may collect, information such as, but not limited to:

- your name;
- your contact details;
- your social media details (e.g. blogs, twitter, Facebook, LinkedIn);
- your gender;
- your employment details;
- your educational qualifications; and
- your inquiry or complaint details.
- your feedback on services that the Club provides

Some personal information is considered sensitive information and includes:

- your Club membership (if any);

The Privacy Act allows the Club to collect sensitive information which relates solely to Club members or people who have regular contact with the Club if the sensitive information relates to the Club's activities. We will only collect sensitive information where we have received your consent to your personal information being collected, used, disclosed and stored by the Club in accordance with this Policy.

Where proof of identity is required for Club Membership, we may request photographic proof of identity in the form of State (other nationally issued) Driver's License; Australian or other nationally issued passport, or Australian state issued Proof of Age or identity card.

Where you provide information to the Club in relation to a job application the personal information you provide will only be collected, held, used and disclosed for the purposes of considering our potential employment with the Club. Where you provide the details of referees, you confirm that you have informed the referees that you are providing their contact information to the Club and they have consented to the Club contacting them and discussing the personal information you have provided in relation to the job application.

We will collect personal information directly from you:

- when we are legally required to do so; or
- unless it is unreasonable or impractical to do so.

Where we have collected personal information about you either directly or by other means as set out above, we will notify you at the time, or as soon as practicable, to ensure that you are aware of such collection and its purpose.

You can choose to interact with us anonymously or by using a pseudonym where it is lawful and practicable. For example, you may wish to participate in a blog or enquire about a particular campaign anonymously or under a pseudonym. Your decision to interact anonymously or by using a pseudonym may affect the level of services we can offer you. For example, we may not be able to assist you with a specific enquiry or investigate a privacy complaint on an anonymous or pseudonymous basis. We will inform you if this is the case and let you know the options available to you.

If we receive unsolicited personal information about or relating to you and we determine that such information could have been collected in the same manner if we had solicited the information, then we will treat it in the same way as solicited personal information and in accordance with the APPs.

Otherwise if we determine that such information could not have been collected in the same manner as solicited personal information, and that information is not contained in a Commonwealth record, we will, if it is lawful and reasonable to do so, destroy the information or de-identify the information.

The purposes for which personal information is collected, held, used and disclosed

The Club collects, holds, uses and discloses your personal information to:

- assist you with membership and Club Activity and employment queries;
- improve our service delivery;
- manage our relationship with you;
- conduct surveys and research;
- conduct Club elections;

Using your information for direct marketing

You consent to our use and disclosure of your personal information for the purposes of direct marketing which may include providing you with information about events, products or services, which may be of interest to you.

If you do not want us to use your personal information for direct marketing purposes, you may elect not to receive direct marketing at the time of providing your personal information.

Unsubscribing and opting out

If you no longer wish to receive direct marketing or other communications, you may request at any time to cancel your consent to such communications as follows:

- If subscribing to an email newsletter you may "unsubscribe" at any time from the newsletter mailing list;
- The Club may, from time to time, send you text messages about issues of importance such as events or campaigns. You may "opt out" by texting STOP in reply to a text message from the Club; or
- You may contact us at any time by mail or email directed to the Club's Personal Assistant who is the Privacy Officer.

Disclosure of your personal information

The Club may disclose your personal information, in connection with or to further the purposes outlined above, to:

- Law Enforcement Agencies and Government Agencies

We take reasonable steps to ensure that each authority which we disclose your personal information to is committed to protecting your privacy and complies with the Australian Privacy Principles, or is subject to a law or scheme that is at least substantially similar to the way in which the Australian Privacy Principles protect information.

How the Club holds personal information

Wherever reasonably practicable the Club holds electronic personal information on data servers that are owned and controlled by the Club in Australia. The data servers are password protected and login secured, and backup copies are maintained offsite by contracted IT service provider(s). However, by providing personal information to the Club you consent to your information being stored in and processed on a secure web based application on a data server or data servers, this is not regarded as a disclosure. The Club will take reasonable steps to ensure that any third party providers comply with the APPs. Wherever reasonably practicable the Club holds physical personal information in access controlled premises.

When the Club no longer requires your personal information for a specific purpose and we are not required to keep it to comply with any laws, we will take such steps as are reasonable in the circumstances to destroy your personal information or to ensure that the information is de-identified.

Government Identifiers

The Club will not adopt as our own identifier a government related identifier of an individual, such as a tax file number or Medicare card number and will only use or disclose a government related identifier where the use or disclosure:

- is reasonably necessary for the Club to verify your identity for the purposes of our activities or functions;
- is reasonably necessary for the Club to fulfil its obligations to an agency or a State or Territory authority;
- is required or authorised by or under an Australian law; or
- is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

How you may seek access and/or correction to personal information held by the Club

You have the right to request access to your personal information and request that it be updated or corrected. In most cases you can gain access to your personal information that the Club . To request access to, correction of, or updating of any personal information held about you, please write to the Privacy Officer at the following address:

The Personal Assistant

Tewantin Noosa RSL & Citizens' Memorial Club Inc

PO Box 15

TEWANTIN QLD 4565

E: pa@noosarsl.com.au

General enquiries can be made via telephone by calling the following number:

P: 07 5447 1766

The Club requires that you provide acceptable photographic proof of identity in order to seek access to your personal information (Drivers License, Passport, or State based proof of age card). The Club may refuse to provide access if permitted to do so by law or under the APPs. The Club will seek to provide you with access to your personal information within 30 days of receipt of a valid request and may charge you a reasonable fee for doing so.

You should contact the Club when your personal information details change. It is important that we keep our membership or employee details up to date. Please contact a Reception or Administration employee to update any personal information.

Reception can be contacted at the following address:

receptionRSL@noosarsl.com.au

How you may complain about a breach of the APPs

To make a complaint about an alleged breach of the APPs please write to or email The Personal Assistant Officer at one of the following addresses:

The Privacy Officer and Personal Assistant

Tewantin Noosa RSL & Citizens' Memorial Club Inc

PO Box 15

TEWANTIN QLD 4565

E: pa@noosarsl.com.au

All complaints must be written. Please provide all details about your complaint as well as any supporting documentation to the Privacy Officer.

How the Club will deal with complaints

The Club will seek to deal with privacy complaints as follows:

- complaints will be treated seriously;
- complaints will be dealt with promptly;
- complaints will be dealt with confidentially;
- complaints will be investigated by the Privacy Officer; and

the outcome of an investigation will be provided to the complainant where the complainant has provided proof of identity. The Club will seek to respond within 30 days of receipt of a valid complaint.

Variations to the Policy

The Club will occasionally update this Privacy Policy to reflect Club and customer feedback and or legal requirements. The Club encourages you to periodically review this Policy on our website(s) to be informed of how the Club is protecting your information.