

## PRIVACY POLICY

Riverwood Legion and Community Club Limited trading as Club Rivers (the 'Club', 'we' or 'us') is a registered club under the Registered Clubs Act 1976. The Club aims to comply with the Australian Privacy Principles ('Principles') set out in the Privacy Act 1998 ('Privacy Act') and has adopted this privacy policy to protect personal information (as defined in the Privacy Act) that we collect, hold, use and disclose. We may update this policy whenever we consider appropriate, for example, to reflect changes to the law or to our business.

As the Principles 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.

This policy does not form part of any contract.

### 1 Collection of Personal Information

#### *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, date of birth, 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 at or from, the Club.

Patrons visiting the Club must produce a recognised form of identification for example your membership card, or for guests and temporary members your passport, driver's licence or proof of age card, to gain entry to our premises. The Club uses terminals to gather this information and to protect the data collected, but scanning of your identification is optional and you may sign in manually if you prefer once your identification has been sighted by an authorised officer of the Club.

The Club collects personal information from you by various means including (without limitation) when you complete your membership application or renewal form, when you enter competitions and promotions, when you deal with us by telephone or in person, when you purchase our products or services (for example food & beverage or gaming), and when you use our facilities.

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

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

#### *Website*

When you access our website the information we collect includes your IP address, type of operating system, type of browser you operate and your general area of location. Otherwise we only collect information from you through our website which you supply voluntarily, for example, when you submit an online enquiry form.

#### *Surveillance*

Some parts of our premises and our courtesy bus are under video surveillance (and sometimes other surveillance) for security reasons. Details of suspected or actual illegal and/or undesirable activities may be shared with other organisations such as the local liquor accord, law enforcement, and regulatory authorities.

*Information received from other parties*

Sometimes, someone else may provide us with personal information about you, with or without your direct involvement. For example, we might collect your personal information from another organisation of which you are a member that uses our premises (such as a local sporting club or community organisation), your representative(s), or another organisation such as a regulatory authority, local liquor accord or industry organisation. If the Club receives personal information about you which it did not request and which it does not reasonably require, we may destroy or de-identify this information where appropriate.

*Sensitive Information*

Some of the information we collect is 'sensitive information' (as defined under the Privacy Act), such as information about your health. The Act requires us 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 Use**

*Members, guests and other customers*

The Club collects, holds and uses the information of its members, guests and other customers in order to:

- identify you and process your membership application or renewal or admit you to our premises (as the case may be);
- comply with statutory requirements under registered clubs, liquor & gaming laws, Anti – Money Laundering and Counter Terrorism laws and other legislation which applies to the Club;
- contact you to advertise and market events, activities, opportunities, offers and the products and services provided by the Club or companies in which the Club 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, gaming, sporting events and venue hire;
- analyse usage of food and other products and services offered by the Club;
- provide you with products or services you have requested and to offer and administer any benefits you subsequently become entitled to in relation to that product or service;
- share your information with companies in which the Club has an ownership interest for the purpose of them marketing their products to you;
- help us properly operate our business (for example, to improve our products and services, for security purposes, and to train our staff and contractors); and
- analyse website usage.

July 5, 2017

The Club will only use your personal information for the purpose for which you have provided it or for other uses permitted under the Privacy Act, and for uses for which you have given consent (which may be express or implied).

When or before the Club collects your personal information, we will take reasonable steps to inform you:

- of the purposes for which the information is collected;
- where applicable, of any law that requires the particular information to be collected; and
- of the main consequences if all or part of the information is not provided.

For example, the Club will be unable to admit you as a member unless you provide us with the required personal information. The Club will also be unable to provide you with certain products and services or allow you to join a Sub-Club, unless you have first provided the Club with the required personal information.

From time to time, the Club 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 help us to improve services.

*Job applicants, staff contractors, suppliers and volunteers*

The Club collects personal information of job applicants, staff, contractors and suppliers for the primary purpose of assessing and (if successful) engaging or employing the person. The purposes for which the Club holds and uses such personal information include managing the employment, or engagement or volunteer work (as the case may be), for insurance purposes, and to meet the Club's legal obligations.

### **3 Disclosure**

The Club aims to limit its disclosure of personal information to the primary purpose for which it has been collected, or for a related purpose as permitted by the Privacy Act. This means the Club will usually only disclose your personal information in connection with our business and our registered club community, social, recreational and sporting activities. This includes when disclosure is necessary to: provide you with a product or service; help us with the running of the Club; or for compliance with our legal obligations.

We may provide your personal information to:

- outsourced service providers who perform functions on our behalf or provide services to us, such as providing security services, mail handling services, and professional advice to the Club;
- other organisations in which we have an ownership interest, for the purpose of them marketing their products and 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 process with another registered club; and
- anyone to whom we are required or authorised by law to disclose personal information.

We generally require third parties only to use your personal information for the purpose for which it was provided. We will only disclose your personal information to third parties on the basis that they agree with us

to keep your information confidential (except where we are authorised or required by law to disclose the information).

Otherwise the Club would only share personal information, including sensitive information, with a third party as permitted by the Privacy Act, including 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.

You consent to us disclosing your personal information to the third parties listed above, and similar organisations who may in turn provide your information to other third parties (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).

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

Your personal information is held securely in our computer system and where your personal information is held in hard copy format this information is either destroyed, held securely at our premises, or held securely within the control of our Sub-Club representatives. We are 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 it. We reserve the right to retain information for longer than the minimum period required under any applicable law if we consider that it is appropriate, but we will hold it in accordance with this policy.

#### **5 Updating your personal information**

The Club relies on the information you provide to us to be accurate and current. If you believe the personal information we hold about you is incorrect please advise us in writing using the details below. To change your name on the membership database supporting documentation from a government source is required. A change of address can be done by contacting the Club's reception. 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.

#### **6 Access**

The Privacy Act generally allows individuals to access records containing their personal information. If you wish to access the personal information the Club holds about you please provide a written request using the details below. The Club will provide you access to your information except where the Privacy Act prohibits it or does not require it, for example, if your request would unreasonably infringe on the privacy of others. We will provide you with a player activity statement for your player card on request.

#### **7 Complaints**

If you wish to make a privacy complaint please put your complaint in writing, providing as much detail as possible, and forward it to us by letter or email using the details below. The Chief Executive Officer, or another representative of the Club, will investigate the complaint and will provide you with a written response within a reasonable time (having regard to the nature of your complaint) following the completion of the investigation.

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If you are not happy with the response, you may contact the Office of the Australian Information Commissioner.

## **8 Overseas Disclosure**

The Club does not transmit personal information overseas. As far as the Club is aware none of its contractors transmit or store data overseas

### **Contact us:**

Chief Executive Officer

Club Rivers

32 Littleton Street

RIVERWOOD NSW 2210

Telephone: 02 9533 3144

Email: [enquiries@clubrivers.com.au](mailto:enquiries@clubrivers.com.au)