

## **ENTITY**

Kingsgrove R.S.L. Club Ltd ABN 32 000 463 196 (the "Club", "we" or "us")

## **SCOPE**

The Club is a registered club under the Registered Clubs Act 1976 (NSW).

This policy applies to all Club members, members' guests, temporary members, and other customers of the Club ("you"), and to all the activities of the Club.

This policy does not apply to the Club's treatment of employee records, which are directly related to a current or former employment relationship between the Club and its employee.

## **PURPOSE**

The purpose of this policy is to ensure that the Club complies with the Privacy Act 1988 (Cth) (Privacy Act) and the Australian Privacy Principles (APP), which govern the way we must manage personal information (as defined in the Privacy Act), and to protect the personal information of our customers, which we take very seriously.

This policy sets out how we collect, hold, use, disclose and otherwise manage personal information about our members and other customers. We encourage all members and customers to check our website regularly for any updates to this privacy policy. We may update this policy whenever we consider appropriate, for example, to reflect changes to the law or to our business.

## **INFORMATION COLLECTED**

### **Types of Information Collected**

We may collect and hold personal information about you, that is, information that can identify you such as your name, address, occupation, date of birth, proof of age, other contact details and the extent of your use of (and preferences in relation to) goods and services offered by, or available at or from the Club, and other information relevant to providing you with the services you are seeking.

If you choose to correspond with us by email, we may retain the content of your email messages together with your email address and our responses.

### **Purpose of Collection**

We will collect, hold and use your personal information for one or more of the following reasons:

- To identify you and process an application you have made for membership or renewal of membership, or to admit you to the Club's premises;
- To establish and maintain 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, (including by direct mail, telephone, email, SMS and MMS), and to register you for such events, promotions, competitions, activities and offers;

- To provide products and services to you, and to administer any benefits to which you may become entitled;
- To provide you with information about other services that may be of interest to you;
- To provide you with promotional information about us;
- To facilitate our internal business operations, including without limitation the fulfilment of any legal enquiries, addressing security concerns and training our employees and contractors;
- To analyse usage of products and services offered by the Club and customer needs;
- To develop new and/or improved products and services for customers;
- To comply with statutory requirements under legislation relating to registered clubs, liquor, gaming, anti-money laundering, counter-terrorism and other legislation which may apply to the Club; or
- To analyse website usage

### **Methods of Collection**

Personal information will generally be collected directly from you through the use of any of our standard forms, competition entry forms, email, comments/contributions to our social media sites, visitor sign-in terminals or when you deal with us in writing, by telephone or in person.

Information about members' purchase of products or use of services or facilities will be collected via use of a membership card at our "Members' Kiosk", any of our Point of Sale terminals and our gaming machines.

### **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 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 to meet its legal obligations.

### **Information received from other parties**

Sometimes, someone else may provide us with your personal information, with or without your direct involvement. For example, we might collect personal information from:

- another organisation of which you are a member, such as a local sporting club using our facilities, or community organisation;
- a regulatory authority, a local liquor accord or another club industry organisation; or
- your representative(s).

### **Failure to provide information**

If the personal information you provide to us is incomplete or inaccurate we may be unable to provide you with the products or services you are seeking, or admit you as a member or with entry to the Club's premises.

## Internet Users

If you access our website we may collect additional personal information about you including your Internet Protocol (IP) address, domain name, type of operating system, type of browser and your general area of location. Also, our website uses cookies. The main purpose of cookies is to identify users and to prepare customised web pages. Cookies do not identify you personally, but they may link back to a database record about you. We use cookies to monitor usage of our website and to create a personal record of when you visit our website and what pages you view, so that we may serve you more effectively.

## Surveillance

Some parts of our premises and our courtesy bus are under video surveillance (and sometimes other surveillance).

## Use and disclosure

Generally, we only use and disclose personal information about you for the purpose for which it was collected, or for a related purpose as permitted by the Privacy Act or for uses for which you have given consent (which may be express or implied). We may disclose personal information about you:

- To service providers who assist us in operating our business, perform functions on our behalf or provide services to us. These service providers are required to comply with the Privacy Act and the APP;
- To other organisations in which the Club has an ownership interest, for the purpose of them marketing their products and services to you;
- To an actual or prospective purchaser of the assets and operation of our business or an actual or prospective amalgamation partner (if we engage in an amalgamation process with another registered club);
- To anyone to whom we are required or authorised by law to do so;
- To relevant authorities when the Club believes that unlawful or undesirable activity is being or has been conducted; or
- To anyone authorised by you to receive your personal information (your consent may be express or implied, and can be withdrawn at any time).

We will only disclose your personal information (including sensitive 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 will only disclose personal information to a third party where the Club has a belief that its use and/or disclosure is necessary:

- to lessen or prevent threats to an individual's life, health or safety;
- to investigate any unlawful or undesirable activity or serious misconduct which is being or has been conducted;
- 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. 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).

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

### **Information security**

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 locked storage of confidential paper records and passworded access to computerised records (depending on the nature of the information that we are holding).

These measures include:

Training of all Kingsgrove RSL Club employees on their legal obligation in respect to the confidentiality of all information obtained.

Password security for all electronic devices including differing security levels for all Kingsgrove RSL Club employees, dependant on their level of responsibility.

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.

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.

### **Access and correction**

If you wish to access the personal information we hold about you, please make a written request to our Privacy Officer. We will aim to provide you with access to the information requested within 30 days. We may charge you a reasonable fee for processing your request. We may decline a request for access to your personal information if the Privacy Act prohibits it or does not require us to provide access.

We will provide you with a player activity statement for your player card on request.

The Club relies on the information you provide to us to be accurate, complete and up to date. If, upon receiving access to your information, or at any other time, you believe the personal information we hold about you is inaccurate, incomplete or out of date please notify us immediately. We will take reasonable steps to correct the information so that it is accurate, complete and up to date.

### **Links to other websites**

Our website may contain links to other sites. We are not responsible for the privacy practices of linked sites and so linked websites are not subject to our privacy policy and procedures.

## Complaints

If you wish to make a privacy complaint, please put your complaint in writing with as much detail as possible and send it to us by letter or email using the details listed above.

The General Manager, the Privacy Officer or another representative of the Club, will consider (and may investigate) the complaint and provide you with a written response within a reasonable timeframe (taking into consideration the nature of your complaint).

If you are not happy with the response received from the Club, you can contact the Office of the Australian Information Commissioner.

## Feedback

If you have any questions regarding our privacy policy or how your information is held, please contact:

The General Manager  
Kingsgrove R.S.L. Club Ltd  
4 Brocklehurst Lane, Kingsgrove NSW 2208  
PO Box 57  
Telephone: 02 9336 1500  
Email: [ian@kingsrsl.com.au](mailto:ian@kingsrsl.com.au)

For information about privacy in general please visit [www.privacy.gov.au](http://www.privacy.gov.au) or contact the Office of the Australian Information Commissioner.