

The Bentleigh Club Privacy Policy

Last Updated: August 2019

The protection of personal information is important to The Bentleigh Club (TBC). TBC is committed to respecting the right to privacy and the protection of personal information.

This document sets out how TBC may collect, hold and use personal information. By providing your personal information to TBC, you consent to its use, storage and disclosure in accordance with this Privacy Policy.

What personal and sensitive information does TBC collect?

Personal Information

Personal information is information or an opinion (including information or an opinion forming part of a database) from which it is possible to determine someone's identity.

The information collected by TBC about a particular person will vary depending on the circumstances of collection. It may include, but is not limited to, a person's contact details (name, email and/or postal address, phone number, next of kin), date of birth, gender, occupation, credit card details, driver's licence number, passport number, insurance details, communication history with TBC, attendance history at the venue, details about a computer device used to access TBC websites or Wi-Fi services (such as IP address, geolocation, domain name and browser type), information downloaded from a TBC website and details of the goods and/or services purchased from TBC.

Sensitive Information

Sensitive information is a type of personal information that also includes information or an opinion about someone's:

- racial or ethnic origin;
- political opinions;
- membership of a political association, professional or trade association or trade union;
- religious beliefs or affiliations or philosophical beliefs;
- sexual preferences or practices;
- criminal record; or
- health, genetic information or disability.

Although unlikely, TBC may also collect sensitive information such as a person's medical history, nationality, their ethnic background or disabilities if it is reasonably necessary in the circumstances.

TBC is required by law to obtain consent when collecting sensitive information. TBC will assume consent to the collection of all sensitive information that is provided to it for use in accordance with this Privacy Policy, unless told otherwise.

How does TBC collect personal and sensitive information?

Information may be collected when you:

- (a) become a member of TBC or a business of TBC;
- (b) purchase goods or services from TBC and attendance at TBC gaming venues;
- (c) subscribe to any publication of TBC or a TBC Business or Affiliate, including electronic publications;
- (d) provide details to TBC or a TBC Business or Affiliate in an application, consent form, survey, complaint, feedback form or incident report (whether in hard copy or online);
- (e) enter personal information into, or agree to having your personal information entered into, one of TBC's online systems;
- (f) access the TBC website or a website of a TBC Business or Affiliate;
- (h) connect to TBC public Wi-Fi systems;
- (i) contact TBC via email, telephone or mail or engage with TBC via social media;
- (j) participate in, or attend, any program, activity, competition or event run by TBC or a TBC Business or Affiliate;
- (k) purchase tickets to a event from TBC;
- (l) purchase merchandise, products or services from TBC;
- (m) are nominated, elected or appointed to the sub-committee of TBC;
- (n) apply for employment or a volunteer position with TBC or a TBC Business or Affiliate; or
- (o) where TBC is required to do so by law (for education, child protection, work health and safety laws, charitable collections, medical treatment or other legislation in Australia).

Providing information

Depending on the circumstances, some types of information will be required and others might be optional. If you do not provide some or all of the information requested, this may affect TBC's ability to communicate with you or provide the requested products or services.

By not providing requested information, you may jeopardise your ability to participate in programs or competitions or apply for employment or volunteer positions with TBC or a TBC Business or Affiliate. If it is impracticable for TBC to deal with you as a result of you not providing the requested information or consent, TBC may refuse to do so.

Collection from third parties

TBC or a TBC Business or Affiliate may collect personal information regarding a child from the parent or other responsible person associated with that child.

In many circumstances, TBC collects information from TBC Businesses or Affiliates or other third parties. Examples of such third parties could include, without limitation, event organisers, contractors, employment agencies, first aid providers, emergency services, Victoria Police, or government and law enforcement bodies.

Information storage and protection

TBC stores information in different ways, including in paper and electronic form.

Much of the information we collect from and about our members and customers is added to TBC's customer relationship management database. When your information is entered into TBC's database, the information may be combined or linked with other information held about you.

Security of personal information is important to TBC. TBC has taken steps to protect the information we hold from misuse, loss, unauthorised access, modification or disclosure. Some of the security measures TBC uses include strict confidentiality requirements of our employees, volunteers, TBC Businesses and Affiliates and service providers, network security audits, security measures for system access and security measures for our website.

We seek to protect your personal information from any unauthorised loss, disclosure or access. However, if a serious data breach occurs, we must notify you as required under the Privacy Act regarding the circumstances of the breach, and must also advise the Office of the Australian Information Commissioner.

How does TBC use and disclose personal and sensitive information?

Use

TBC, and third parties to whom we may disclose personal information in accordance with this Privacy Policy, may use your personal information to:

- (a) verify your identity;
- (b) complete background checks;
- (c) research, develop, run, administer and market competitions, programs, activities and other events;
- (d) provide you with goods and services;
- (e) enforce TBC rules and by-laws, entry and disciplinary procedures;

- (f) administer customer loyalty schemes and programs;
- (g) provide you with information about events, products and/or services that may interest you;
- (h) undertake functions and activities relating to membership, sponsorships and partnerships, competitions, events, gaming operations and customer service;
- (i) research, develop and market products, services, merchandise and special offers made available by us and third parties;
- (j) respond to emergency situations involving or requiring medical treatment;
- (k) follow up on incident reports including the management of insurance claims;
- (l) undertake administrative functions, such as billing;
- (m) provide communications required under TBC Club Rules;
- (n) administer, manage and provide you with access to the TBC website; and
- (o) keep you informed of news, activities and opportunities via various mediums.

Although unlikely, TBC may use your health information to ensure that programs we operate are run safely and in accordance with any special health needs participants may require. Health information may also be kept for insurance purposes. In addition, we may use de-identified health information and other sensitive information to plan events and activities.

Disclosure

TBC may disclose your personal information to a range of organisations which include, but are not limited to:

- (a) companies we engage to carry out functions and activities on TBC's behalf, including mail fulfilment, direct marketing and information technology service providers;
- (b) our professional advisers, including our accountants, auditors and lawyers;
- (c) our insurers;
- (d) relevant sporting bodies; and
- (e) in other circumstances permitted by law.

In some circumstances, some personal information may also be disclosed outside of Australia (the USA). In such circumstances, TBC will use its best endeavours to ensure such parties are subject to a

law, binding scheme or contract which effectively upholds principles for fair handling of the information that are suitably similar to the Australian Privacy Principles.

Direct marketing

We will assume consent to use non-sensitive personal information to provide better services and for marketing purposes (including disclosure of such information to service providers).

Every person whose data is collected by TBC has the option to refuse e-mail, SMS or posted offers by making a request in writing to TBC via the contact details set out below or by making use of the opt-out procedures included in any communications from us (however, information relating to the option to unsubscribe from those communications may be retained).

Other disclosures

In addition, TBC may also disclose personal information:

- (a) with your express or implied consent;
- (b) when required or authorised by law;
- (c) to an enforcement body when reasonably necessary; or
- (d) to lessen or prevent a threat to an individual or public health or safety.

TBC website

When users visit the TBC website, our systems may record certain information about their use of the site, including the web pages visited, the time and date of a user's visit to the site and each individual webpage, as well as the content of any online forms which users have commenced to complete. TBC uses this information to help analyse and improve the performance of the TBC website.

In addition we may use "cookies" on the TBC website. Cookies are small text files that help a website to remember the preferences of users to improve the experience of using that website. In some cases, the cookies that we use may collect some personal information. TBC will treat this information in the same way as other personal information we collect. You are free to disable cookies on your internet browser to prevent this information being collected; however, you will lose the benefit of the enhanced website experience that the use of cookies may offer.

Websites linked to the TBC website are not subject to TBC's privacy standards, policies or procedures. TBC cannot take any responsibility for the collection, use, disclosure or security of any personal information that you provide to a third party website.

Accessing and seeking correction of information held by TBC

TBC will take all reasonable steps to ensure that the personal information it collects, uses or discloses is accurate, complete and up-to-date. However, we rely on the accuracy of personal information as provided to us both directly and indirectly.

We encourage all users to regularly review and update their personal information. If you would like to access personal information that we hold about you, we require you to put your request in writing. If we do not allow you access to any part of the personal information we hold about you, we will tell you why.

Individuals may also request access to their personal information held by us by making a request via the contact details set out below. We will respond to your request for access within 14 days and endeavour to provide the requested information within 30 days. If you find that the personal information we hold about you is inaccurate, incomplete or out-of-date, please contact us immediately and we will see that it is corrected.

Resolving privacy issues and complaints

Any issues or complaints in relation to the collection, use, disclosure, quality, security of and access to your personal information may be made to the TBC at this address:

TBC Privacy Officer

33 Yawla Street Bentleigh 3204

Email: manager@thebentleighclub.com.au

Phone: (03) 9557 7938

We will respond to your complaint within 30 days and try to resolve it within 90 days. If we are unable to resolve your complaint within this time, or you are unhappy with the outcome, you can contact the Office of Australian Information Commissioner via its enquiries line 1300 363 992 or website <http://www.oaic.gov.au/> to lodge a complaint.

For further information on TBC's management of personal information, please contact us using the details above.

TBC may amend this Privacy Policy from time to time.