



# Privacy Policy

for the

## Lakes Entrance Bowls Club Inc.

August 2017

## Contents

1.	We respect your privacy.....	2
2.	What personal information we collect.....	2
3.	How we collect your personal information.....	3
4.	Use of your personal information.....	3
5.	Disclosure of your personal information overseas.....	4
6.	Security of your personal information.....	4
7.	Access to and correction of your personal information.....	4
8.	Complaints about privacy and access refusal.....	5
9.	Changes.....	5
10.	When you visit our website.....	5

# Privacy Policy

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## **1. We respect your privacy**

1.1 The Lakes Entrance Bowls Club respects your right to privacy and this policy sets out how we collect and treat your personal information.

1.2 “Personal information” is information we hold which is identifiable as being about you.

## **2. What personal information we collect**

2.1 We may collect the following types of personal information from you:

- (a) name
- (b) phone number
- (c) fax number
- (d) information about the Club’s goods or services you have been supplied with
- (e) information from enquiries you have made
- (f) communications between us
- (g) credit card information
- (h) email address
- (i) date of birth
- (j) Club membership details and history
- (k) sporting competitions you have entered
- (l) trade promotions you have participated in
- (m) information required to be included in gaming/alcohol/AML/CTF registers.

2.2 In some instances we may collect “sensitive information”, for example:

- (a) information about your health or disabilities for the purpose of playing sport,
- (b) people who work with children at the Club are required to have a Working With Children check
- (c) employees and Board members may be required to provide police checks

### **3. How we collect your personal information**

3.1 We collect personal information from you by extracting information from a variety of sources, including:

- (a) membership applications and renewals
- (b) electronic or personal interaction with us;
- (c) when you access our website;
- (d) when we provide our goods and services to you;
- (e) entry forms for trade promotions, loyalty programs and sporting competitions;
- (f) the documents and information we are required to collect to comply with our
  - (i) Responsible Service of Alcohol Policy
  - (ii) Responsible Service of Gambling Policy
  - (iii) AML/CTF Program
  - (iv) Rules regarding admission of guests and authorised gaming visitorsWe are required collect all this information to comply with the law.

3.2 We take reasonable steps to ensure that your personal information is secure.

### **4. Use of your personal information**

4.1 We use your information to:

- (a) provide our goods and services to you;
- (b) to comply with our legal obligations including under the following legislation:
  - (i) Liquor Control Reform Act
  - (ii) Gambling Regulation Act;
  - (iii) AML/CTF Act
  - (iv) Associations Incorporation Act or Corporations Act
- (c) to comply with the rules of the peak sporting bodies with which we are associated;
- (d) to conduct our loyalty programs and to provide you with the benefits of those programs;
- (e) send you direct marketing material from the Club only when you have agreed to receive it and have not opted out
- (f) we also use it to improve our service and to notify you of opportunities that we think you might be interested in.

4.2 We do not provide your information to third parties, except that we may provide your information to our business partners who assist us in the provision of our services to you, or where we are legally bound to do so.

4.3 Because of the requirements in the legislation listed above the Club cannot provide for anonymity and pseudonymity when you deal with us

**5. Disclosure of your personal information overseas**

We do not disclose your personal information to overseas recipients.

**6. Security of your personal information**

6.1 We take reasonable steps to protect your personal information. However we are not liable for any unauthorised access to this information.

6.2 We destroy or de-identify your personal information when it is no longer required for the purpose we collected it.

**7. Access to and correction of your personal information**

7.1 Generally you can access your personal information by contacting the Manager at the Club, contact details are listed below. We may charge a reasonable administration fee for this access.

7.2 We may not give you access to your personal information in the following circumstances:

- (a) Giving you access would pose a serious threat to the life, health or safety of any individual or to public health or public safety; or
- (b) Giving access would have an unreasonable impact on the privacy of other individuals
- (c) The request for access is frivolous or vexatious
- (d) The information relates to existing or anticipated legal proceedings
- (e) Giving access would prejudice negotiations we are having with you
- (f) Giving access would be unlawful
- (g) Giving access would impede an investigation into serious misconduct or suspicious matters
- (h) Giving access would reveal material that is commercially sensitive for the Club.

7.3 We will respond to any request for access to personal information within a reasonable time and if we do not give you access we will tell you why.

7.4 Apart from the persons who need to know for the purpose we collected the personal information, we only provide access to personal information to the person to whom it relates.

## **8. Complaints about privacy and access refusal**

8.1 If you have any complaints about our privacy practices, or being denied access to your personal information please feel free to send in details of your complaints to the Club's President or Chairman of the Board. We take complaints very seriously and will respond shortly (usually in less than 30 days) after receiving written notice of your complaint.

8.2 If you still unsatisfied you can refer your complaint to the Information Commissioner on [www.oiac.gov.au](http://www.oiac.gov.au)

## **9. Changes**

9.1 Please be aware that we review this Privacy Policy from time to time and we may change this Privacy Policy in the future. If you would like to make comments about our Privacy Policy please direct them to the Manager of the Club

9.2 Revised versions of the Privacy Policy will be uploaded onto our website, so please check back from time to time.

## **10. When you visit our website**

10.1 When you come on to our website we may collect certain information such as browser type, operating system, website visited immediately before coming to our site, etc. This information is used in an aggregated manner to analyse how people use our site, such that we can improve our service.

10.2 As is very common for companies, we may use cookies on our website. Cookies are very small files which a website uses to identify you when you come back to the site and to store details about your use of the site. Cookies are not malicious programs that access or damage your computer.

10.3 Our site has links to other websites not owned or controlled by us. We are not responsible for these sites or the consequences of you going on to those sites.

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