

PRIVACY POLICY CLUB MUDGEE

Revision No.:1.2

Effective Date: Apr 2014

Review Date: Mar 2021

Purpose

To explain how Mudgee Soldier's Club Ltd ("Club Mudgee") handles personal information and complies with the requirements of the Privacy Act 1988 (Cth) ("Privacy Act") and the Australian Privacy Principles ("APPs").

Overview

Overview Club Mudgee collects and holds personal information in order to conduct its business. Club Mudgee is committed to protecting the privacy of its members, temporary members, guests, employees, contractors and other individuals.

Scope

Scope This policy applies to Club Mudgee and any entity owned or controlled by Club Mudgee.

This policy applies to personal information Club Mudgee collects from you:

- In person and/or in writing
- Via surveys
- · Via our website and/or social media
- · Via telephone, email and/or fax.

This policy also applies to personal information Club Mudgee collects from other third parties about you.

Policy Statement Collection of Personal Information

Policy Statement

The main types of personal information Club Mudgee collects and holds relate to the contact details of our members and guests, suppliers and other business contacts. Typically this information includes names, addresses, telephone numbers, email addresses. In the course of providing services to members and guests, we may also collect and hold more detailed personal information, for example birthdates.

You might provide Club Mudgee with this information when completing a membership form, taking part in a competition or promotion, responding to a survey, etc.

Because of the nature of our business, dealing with individuals on an anonymous basis or through the use of a pseudonym is not possible. Club Mudgee is obligated to correctly identify members, temporary members and guests when they enter Club Mudgee which means collecting your true identity.

Where you provide information to Club Mudgee in relation to a job application, the personal information you provide will only be collected, held, used and disclosed for the purpose of considering your potential employment with Club Mudgee. Where you provide the details of referees, you confirm that you have informed the referees that you have provided their contact information to Club



Mudgee and they have consented to Club Mudgee contacting them and discussing the personal information you have provided in relation to the job application.

If we receive unsolicited personal information about or related 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, we will, if it is lawful and reasonable to do so, destroy or de-identify the information.

The Privacy Act allows Club Mudgee to collect sensitive information if the sensitive information relates to Club Mudgee'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 Club Mudgee in accordance with this policy.

Use of Personal Information

The main purposes for which Club Mudgee collects, holds and uses personal information are:

- · To provide our services;
- To manage our relationship with our members;
- To respond to an individual request;
- To maintain contact with members, employees, contractors and other individuals;
- For general management and reporting purposes, such as invoicing and account management;
- · For recruitment purposes;
- For purposes related to the employment of our staff and providing internal services to employees;
- To obey the law; and
- Other purposes related to Club Mudgee's business. If you choose not to provide us with personal information, we may not be able to undertake these activities effectively.

Club Mudgee will only use your personal information for direct marketing purposes when we are permitted to under the Privacy Act, which may include providing you with information about events, products or services which may be of interest to you. You may opt out of receiving further marketing information by contacting our Privacy Officer.

If Club Mudgee collects, holds or uses personal information in ways other than as stated in this policy, we will ensure we do so pursuant to the requirements of the Privacy Act.

Disclosure of Personal Information

Club Mudgee does not routinely disclose personal information to other organisations unless



- · Use or disclosure is permitted by this policy;
- We believe it is necessary to provide you with a product or service you have requested or, in the case of an employee or contractor of Club Mudgee, it is necessary for maintaining or is related to your role at Club Mudgee;
- To protect the rights, property or personal safety of any member of the public or a customer of Club Mudgee or the interests of Club Mudgee;
- Some or all of the assets or operations of Club Mudgee are or may be transferred to another party as part of the sale of some or all of Club Mudgee's business;
- You give your consent; or
- Such disclosure is otherwise required or permitted by law, regulation, rule or professional standard.

Club Mudgee uses a range of service providers to help us maximise the quality and efficiency of our services and our business operations, including internal business requirements such as recruitment and human resources-related operations. This means that individuals and organisations outside of Club Mudgee will sometimes have access to personal information held by Club Mudgee and may collect or use it from or on behalf of Club Mudgee. This may include, but is not limited to, independent contractors and consultants, mail houses, off-site security storage providers, information technology providers, event managers and debt collecting agencies.

We require our service providers to adhere to Club Mudgee's privacy policy and not to keep, use or disclose personal information we provide to them for any unauthorised purposes.

Privacy on Club Mudgee's Websites and Applications

This policy also applies to personal information we may collect via our websites and applications, including mobile applications. In addition to personal information you provide to us directly, Club Mudgee may also collect personal information from you via the Club's applications and websites.

Club Mudgee may provide links to websites operated by third parties. Club Mudgee is not responsible for the privacy practices or policies of those sites and we encourage you to review each website's privacy policy, especially if you intend to disclose personal information via that site. A link to a non-Club Mudgee website is not an express or implied endorsement, or promotion of the products or services offered by, accessible through or advertised on that site.



Security of Personal Information

Depending on the purpose for which we have collected personal information (for example, for the purposes of Club Membership), we may store some of the information electronically in the Club's computer database known as EBET.

Some or all of this information may be available to authorised staff of Club Mudgee for use in accordance with this policy

Club Mudgee will endeavour to take reasonable steps to protect the security of personal information which we hold about you, whether electronically or in hard-copy, from misuse and loss and from unauthorised access, modification or disclosure.

Club Mudgee employees are required to respect the confidentiality of personal information and the privacy of individuals and only the necessary Club Mudgee employees has access to your information.

Club Mudgee uses secure servers and other appropriate measures to protect electronic data, including protection by the use of firewalls. We also use internal access policies, physical access restrictions, network structures, passwords and more.

It is Club Mudgee policy not to retain personal information once there is no longer a legal or business need for us to do so.

Access to and Correction of Personal Information

Club Mudgee endeavours to ensure that the personal information we hold is accurate, complete and up to date. We will provide access to your personal information within 30 days of receipt of a valid request, except in the limited circumstances in which it is permitted for us to withhold this information, for instance where granting access would infringe another person's privacy.

When you make a request to access personal information, Club Mudgee will require you to verify your identity (a driver's licence or passport for example) and to specify what information you require. In some cases we may also request an administrative fee to cover the cost of the access.

You should contact Club Mudgee when your personal information details change. It is important that we keep our membership details up to date for example. Please contact Club Mudgee to update any personal information.



Concerns and Complaints

If you have concerns about how we are handling your personal information, please contact us and we will try to resolve those concerns. All complaints must be written and addressed to the Privacy Officer.

If Club Mudgee becomes aware of any ongoing concerns or problems regarding our privacy practices, we will take these issues seriously and work promptly to address the concerns. Club Mudgee will seek to respond in writing within 30 days of receipt of a valid complaint, and provided the complainant has provided proof of identity.

If you have any further queries relating to our privacy policy, or you have a problem or complaint, please contact our Privacy Officer. If you remain unsatisfied with the Privacy Officer's response, it is your right under the Privacy Act to lodge a complaint with the Officer of the Australian Information Commissioner (OAIC).

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Privacy Officer Contact Details
Privacy Officer
Club Mudgee
99 Mortimer Street
Mudgee NSW 2850
(02) 6378 1922
Or email the Privacy Officer at info@clubmudgee.com.au

Linked Documents · Australian Privacy Act 1988 (Cth)

- Anti-Money Laundering and Counter Terrorism Finance Act 2006
- Registered Clubs Act 1976
- Gaming Machines Regulation 2010
- Gaming and Liquor Administration Act 2007
- Employee Code of Conduct
- IT Acceptable Use of Resources Policy

Questions - Chief Executive Officer **Supersedes** - All previous policies and / or statements.