

# PRIVACY POLICY OF GRACEVILLE BOWLS CLUB Inc

## 1. Foreword

---

- 1.1 **Graceville Bowls Club is committed to safeguarding member's privacy and ensuring the confidentiality and security of the personal information we may collect from you.**
- 1.2 **To comply with legal requirements and to run our business effectively, it is necessary for us to collect certain personal information from members and other individuals and organisations we associate with. At the minimum, this may include information such as member's names, addresses and contact details. Additional information may be required, depending on the nature of your dealings with the Club.**
- 1.3 **We will only use or disclose your personal information for the primary purpose it was collected for, unless you have consented to the information being used for a secondary purpose or if required or permitted by law.**
- 1.4 **The Club takes all reasonable measures to protect personal information from loss, unauthorised access, destruction, misuse, modification or disclosure. However, despite concerted efforts, the Club takes no responsibility for the unauthorised use of personal information.**

## 2. Object of this Policy

---

- 2.1 The object of this policy is to maximise the opportunity for members to play bowls and socialise within our club and visit other clubs, and at the same time respect the personal privacy of members.

## 3. What is Personal Information?

---

- 3.1 **Personal information is defined under the *Privacy Act 1988* to mean information or an opinion, whether true or not, and whether recorded in a material form or not, about an individual whose identity is reasonably identifiable, from the information or opinion.**
- 3.2 **Some examples of personal information are your name, residential address, email address, bank details, photos and opinions on your likes and dislikes that can identify you.**

## 4. What is Sensitive Information?

---

- 4.1 Sensitive information is a subset of personal information.
- 4.2 It means information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political organisation, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information about an individual, genetic information, biometric information that is to be used for the purpose of automated biometric verification or biometric identification or biometric templates.

## 5. Consent to collection of certain types of sensitive information

---

- 5.1 We may collect certain types of sensitive information where you have consented and agreed to the collection of such information.

- 5.2 The main type of information that we may collect (if any) will usually relate to your:
- special food or dietary requirements due to medical, cultural or religious reasons;
  - racial origin and religious beliefs, to the extent these are ascertainable from any photographic identification (such as a driver's license or passport);
  - gambling habits; and
  - health or medical information (members may choose to declare any health and disability issues they have in the interest of better first aid in an emergency).

5.3 Sensitive information will only be collected if it is necessary for, or incidental to, the purposes of collection set out in Clause 7.

## **6. Collection of your personal information**

---

6.1 **We will only collect your personal information that is necessary for us to provide our products and services to you.**

6.2 **The type of information includes (but is not limited to) the following:**

- your contact information such as full name (first and last), e-mail address, current postal address, delivery address (if different to postal address) and phone numbers;
- your date of birth;
- your social media details;
- proof of your identity (including, but not limited to, driver's licence, passport, birth certificate);
- any sensitive personal information listed above;
- emergency contact details (information for next of kin or carer);
- details required as part of your club membership or visitation, including but not limited to the information required under the members and visitors registers;
- whether you participated in any activity or event organised by the club;
- use of point of sale terminals to purchase goods;
- photographs or video footage taken at our premises, which may include you;
- details of any enquiries or complaints made by you; and
- if you are requesting products or services from us or we are purchasing goods or services from you, any relevant payment or billing information.

6.3 **As far as possible or unless provided otherwise under this privacy policy, we will collect your personal information directly from you. If we collect details about you from someone else, we will, whenever reasonably possible, make you aware that we have done this and the reason for it.**

6.4 **Depending upon the reason for requiring the information, some of the information we ask you to provide may be identified as mandatory or voluntary. If you do not provide**

**the mandatory data or any other information we require in order for us to provide our services to you, we may be unable to provide or effectively provide our services to you.**

- 6.5 If you use our website, we may utilise "cookies" which enable us to monitor traffic patterns and to serve you more efficiently if you revisit our website. A cookie does not identify you personally but may identify your internet service provider or computer. You can set your browser to notify you when you receive a cookie and this will provide you with an opportunity to either accept or reject it in each instance.

## **7. Use and disclosure of your personal information**

---

- 7.1 **We will only use or disclose your personal information for the primary purposes for which it was collected or as consented to and/or as set out below.**

- 7.2 **You consent to us using and disclosing your personal information to facilitate a purpose in connection with:**

- if required, the verification of your identity, including the verification of your date of birth;
- facilitating membership or visitation requirements (for example, entry into the Register of Members which is available for public inspection by other members);
- provision of our products and services to you;
- facilitating the administration, management and improvement of the club;
- any requirement to include you in various registers maintained by the club including, but not limited to, the register of excluded persons;
- facilitating medical assistance in the event of a medical emergency, or to provide you with medical treatment as requested by you;
- your participation in any activity or event organised by the club or a third party;
- your ability to attend other member clubs in Australia or New Zealand;
- coordinating, managing and maintaining good order and security of the club and our premises, which shall include but is not limited to protecting the rights and safety of other parties in our premises;
- the improvement of our services;
- the maintenance and development of our products and services, business systems and infrastructure;
- marketing and promotional activities by us, our related bodies and other like companies (including by direct mail, telemarketing, email, SMS and MMS messages) such as our customer loyalty programs and newsletters;
- to provide customer service functions, including handling customer enquiries and complaints;
- to offer you updates, or other content or products and services that may be of interest to you;
- our compliance with applicable laws;

- the transfer, and matters in connection with a potential transfer, of the club to another entity; and
- any other matters reasonably necessary to continue to provide our products and services to you.

**7.3 Membership details are entered into the Bowls Australia (BA) database – Bowlink, and the Bowls Queensland (BQ) database. Access to these databases is restricted to authorised BA, BQ, CDBA and Graceville Bowls Club officials. These records are kept for compiling statistics, for organising inter-Club Pennant, Championship events and for invoicing purposes.**

**7.4 We may also use or disclose your personal information and in doing so we are not required to seek your additional consent:**

- when it is disclosed or used for a purpose related to the primary purposes of collection detailed above and you would reasonably expect your personal information to be used or disclosed for such a purpose;
- if we reasonably believe that the use or disclosure is necessary to lessen or prevent a serious or imminent threat to an individual's life, health or safety or to lessen or prevent a threat to public health or safety;
- if we have reason to suspect that unlawful activity has been, or is being, engaged in; or
- if it is required, permitted or authorised by law.

**7.5 In the event we propose to use or disclose your personal information other than for the reasons above, we will first seek your consent prior to such disclosure of use.**

## **8. GRACEVILLE BOWLS CLUB Members Directory**

---

**8.1 The GRACEVILLE BOWLS CLUB member's phone directory will be made available to all GRACEVILLE BOWLS CLUB members and other bowlers for the purpose of contacting them for club matters and playing bowls.**

**8.2 The addition of member's personal details to this directory is automatic but if a member does not want to be listed then they must request to have their names and or contact details deleted.**

**8.3 The (GRACEVILLE BOWLS CLUB phone directory may have age brackets and genders grouped, including but not limited to eg Men, Ladies, Juniors, Veterans.**

**8.4 More detailed information of birthdates is included on the Membership database for checking eligibility for specific competitions and the awarding of badges for age, for example Veteran badges.**

**8.5 The phone directory may include all membership categories or be limited as decided by GRACEVILLE BOWLS CLUB Management.**

## 9. Photographs and Closed Circuit Television

---

- 9.1 We use closed circuit televisions (CCTV) at certain locations throughout our premises (e.g. entry and exit) and surrounding areas. The CCTV is integral to our security system and CCTV images are stored for a minimum period of 28 days.
- 9.2 If an incident is identified, CCTV footage must be retained for a minimum period of one year after the retention period unless they are given to a relevant authority (e.g. the Queensland Police Service). The CCTV footage must be archived if requested by the relevant authority.
- 9.3 If an incident occurs at the venue, CCTV footage for the period leading up to, during and following the incident must be archived. Where no incident has been identified, the CCTV footage is automatically deleted within 30 days after the minimum retention period.

## 10. Data quality and security

---

- 10.1 We have taken steps to help ensure your personal information is safe. You will appreciate, however, that we cannot guarantee the security of all transmissions or personal information, especially where the Internet is involved.
- 10.2 Notwithstanding the above, we will take reasonable steps to:
- (a) make sure that the personal information we collect, use or disclose is accurate, complete and up to date;
  - (b) protect your personal information from misuse, loss, unauthorised access, modification or disclosure both physically and through computer security methods; and
  - (c) destroy or permanently de-identify personal information if it is no longer needed for its purpose of collection.
- 10.3 However, the accuracy of personal information depends largely on the information you provide to us, so we recommend that you:
- (a) let us know if there are any errors in your personal information; and
  - (b) keep us up-to-date with changes to your personal information (such as your name or address).
- 10.4 **The club undertakes an annual review of its member's details. Prior to renewing a member's membership, we will provide you with the current details we hold on the system. If there are errors in these details, we urge you to advise the club and we will update them accordingly.**
- 10.5 **Personal information which is held by the club will be destroyed, when the club receives:**
- (a) A request from an individual that their membership be terminated;
  - (b) Notification of the death of a member or a person for which the club holds personal information for; or
  - (c) Notification that a membership has lapsed and is not renewed within the six-month grace period.

## **11. Storage of personal information**

---

- 11.1 **The club holds physical documents and files which contain personal information in restricted access areas. All files are accessible, strictly by approved personnel.**
- 11.2 **Electronic personal information may be stored on servers that are owned and controlled by the club. The servers will be password protected and feature a secured login.**
- 11.3 **All ‘back-up’ stores are held off site and maintained by contracted IT Service Providers.**
- 11.4 **We keep an “emergency database” or another record keeping system. Members may provide any medical information they consider relevant, and they may ask for it to be stored in a sealed envelope in an unsecured place with emergency access by anyone. This will only be done on an individual basis if the member has provided their consent.**
- 11.5 **At such time that the club does not require your personal information (and is not obligated to keep records by law), the club will take all reasonable steps to ensure that the information is de-identified and destroyed.**

## **12. Access to and correction of your personal information**

---

- 12.1 You are entitled to have access to any personal information relating to you which we possess, except in some exceptional circumstances provided by law. You are also entitled to edit and correct such information if the information is inaccurate, out of date, incomplete, irrelevant or misleading.
- 12.2 If you would like access to, or if you would like to correct any records of personal information, we have about you, you are able to access and update that information (subject to the above) by contacting us via the details set out at the end of this document.
- 12.3 Prior to accessing any confidential information, you may be required to produce acceptable photographic identification. Failure to comply with this requirement, may result in your request for information being denied.
- 12.4 Prior to providing you with the information, the club may charge a reasonable fee to cover any and all administration costs.

## **13. Consent**

---

- 13.1 You are agreeing to the terms of this privacy principle if you visit the club, use our website or by accepting the terms of one of our terms and conditions (relating to a product or service offer) which refer to this privacy policy.
- 13.2 We reserve the right to modify the privacy policy as our business needs require. We will notify you of such changes (whether by direct communication or by posting a notice on our website), after which, your continued use of our products, services or website or your continued dealings with us shall be deemed to be your agreement to the modified terms. If you do not agree to our continued use of your personal information due to the changes in our privacy policy, please contact us via the details set out at the end of this document.

## **14. Resolving Privacy Complaints**

---

- 14.1 We have put in place an effective mechanism and procedure to resolve privacy complaints. We will ensure that all complaints are dealt with in a reasonably appropriate timeframe so that any decision (if any decision is required to be made) is made expeditiously and in a manner that does not compromise the integrity or quality of any such decision.

14.2 If you have any concerns or complaints about the manner in which we have collected, used or disclosed and stored your personal information, you can tell us by contacting the Privacy Officer and Compliance Manager.

- Telephone: 07 3379 1302
- Email: gracevillebowls@tpg.com.au
- Post: PO Box 11, Sherwood, QLD, 4075

To ensure confidentiality, please clearly mark your correspondence to the attention of the Secretary

14.3 In order to resolve a complaint, we:

- (a) will liaise with you to identify and define the nature and cause of the complaint;
- (b) may request that you provide the details of the complaint in writing;
- (c) may request that you provide any and all supporting documentation;
- (d) will keep you informed of the likely time within which we will respond to your complaint; and
- (e) will inform you of the legislative basis (if any) of our decision in resolving such complaint.

14.4 We will keep a record of the complaint and denote any action taken in a privacy register.

**Date of Effect: 5<sup>th</sup> November 2021**

---