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# PRIVACY POLICY

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The Canberra North Bowling and ACT Rugby Union Club (The Club) respects your right to privacy and is committed to protecting your personal information.

This Privacy Policy outlines how we manage your personal information. Our policy follows the Australian Privacy Principles (APPs) contained within the *Privacy Act 1988* (Cth) (the Act). It sets out:

- How and when the Club collects personal information;
- How the Club uses and discloses personal information;
- How the Club keeps personal information secure, accurate and up to date;
- How an individual can access and correct their personal information; and
- How the Club will facilitate or resolve a privacy complaint.

By visiting the Club, using our services, visiting our website or giving us your personal information, you agree to our collection, storage, use and disclosure of your personal information in accordance with this Privacy Policy.

## WHAT IS PERSONAL INFORMATION?

The Act defines:

- ‘personal information’ 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 information or opinion.
- ‘sensitive information’ (a type of personal information) to mean information or an opinion about an individual’s race or ethnic origins, political opinions and associations, religious beliefs or affiliations, philosophical beliefs, sexual preferences or practices, trade or professional associations and memberships, union membership, criminal record, health or genetic information or biometric information.

The kind of personal information that we collect is:

- Your contact information such as full name (first and last), e-mail address, current postal address, and phone numbers;
- Your date of birth;
- Proof of your identity (including, but not limited to, driver’s licence, passport, birth certificate);
- Communications between you and the Club;
- If you work for the Club as an employee or are associated with the Club as a supplier or contractor, we will naturally have some details on you or your organisation;
- When a membership card is used in a gaming machine, swipe machine or at any of our restaurants, bars or point of sale outlets, the information is used to award ‘Membership Rewards’ and is cross referenced with our membership database. This information, in a consolidated manner, is used to help make decisions on changing or improving our service offerings.

We do not collect sensitive information unless:

- the information is reasonably necessary for our activities or required or permitted by law and

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- you have consented to the collection of the sensitive information (either expressly or by disclosing the information to us).

## HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

The Club may collect information from you in a number of ways. These include, but are not limited to when you:

- Apply for membership;
- Apply for employment with us, or provide goods or services to us;
- Enter the Club premises
- Purchase or otherwise request food, beverage, event tickets or other products or services;
- Use a credit card or EFTPOS for purchases;
- Enter a competition, or voting forum, or complete a survey or questionnaire;
- Use our membership loyalty program;
- Use our services with your membership card;
- Use the ACT Self Exclusion Agreement;
- Communicate with us whether in writing, verbally, in person or via our website or social media.
- When you visit the Club website in which case our internet service provider makes a record of the visits and logs the following information for statistical purposes - the user's server address, the user's top-level domain name (eg: .com, .gov, .au, etc), the date and time of visit to the site, the pages accessed and documents downloaded, the previous site visited and the type of browser used. No attempt will be made by the Club to identify users or their browsing activities. We may use 'cookies' to enhance the functionality of the website; however, cookies are not used to record any personal information (eg: name, address, e-mail address).

Where lawful and practicable, we will give you the option of interacting with us anonymously or using a pseudonym. However, in certain instances, we may not be able to deal with you if you don't provide the required personal information. In particular (without limitation):

- **Guests:** Under the Gaming Machine Act interstate visitors and signed-in local guests are required by the Club to produce a recognised form of identification, i.e. passport, drivers licence or proof of age card to gain entry to the premises. The Club uses a sign in book to gather this information and to protect the data collected, i.e. addresses of patrons.
- **Surveillance of Venues:** The Club uses video surveillance for safety and security reasons. Details of suspected or actual illegal and/or undesirable activities on our premises may be shared with other clubs, law enforcement and regulatory bodies such as the Access Canberra and the ACT Gambling and Racing Commission.

If you provide us with someone else's personal information, you agree that you have their consent to provide that information to us, and that you have told them that this Policy applies and where to find it.

If we receive personal information about you that we have not requested, and we determine that we could not have lawfully collected that information under the APPs had we asked for it, we will destroy or de-identify the information if it is lawful and reasonable to do so.

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## WHY DO WE COLLECT YOUR PERSONAL INFORMATION AND HOW DO WE USE IT?

The Club collects personal information in order to:

- Identify you and process your membership application;
- Employ you or engage with you to obtain goods or services;
- Provide you with goods or services or membership benefits offered by the Club;
- Meet our statutory requirements, including (without limitation) under legislation governing incorporated associations, use of gaming machines, anti-money laundering and counter terrorism including the following:
  - Patrons that enter a club premises in the ACT are required to be members of a club. Section 146 of the Gaming Machine Act 2004 defines an eligible club if (g) the premises occupied by the club, and the facilities and property of the club, are kept and maintained for the benefit of members. Section 55(h) provides that only members and signed in guests can play gaming machines in the club. In addition, Section 55(g) requires that guests must be signed into a venue by a club member, and must be accompanied by the member who signed them in. Pursuant to Section 39 of the Act, a licensee commits an offense if a licence is subject to a condition and the licensee fails to comply with a requirement of the condition. Maximum penalty 100 units.
  - The Liquor Act 2010 section 20 requires us to have a club licence that authorises a club to sell liquor to adults who are members of the club, temporary members, or signed in guests of a member. As the Canberra North Bowling Club and Rugby Union Club is a registered association, the information The Club must collect from members when they sign up is governed by the Associations Incorporation Act (link below). Part 4, Division 4.3 (p53) describes the Register of members, Inspection of register of members and restriction of access to personal information, including the following:
    - Register of members (1) An incorporated association must keep and maintain a register of members in accordance with this section. (2) The register of members must contain the following information about each person who is a member of the association: (a) the person's name and contact details; (b) if applicable—the class of membership of the person; (c) the date the person became a member of the association; (d) anything required by the association's rules; (e) anything else prescribed by regulation. Penalty for not complying is covered by Part 9 of the above Act.
- Will not disclose information to overseas recipients
- The register of Members of the Association must be open to inspection at a place in the ACT free of charge by a Member of the Association at any reasonable hour.
- Contact you to advertise and market events, activities, opportunities, offers and the goods and services provided by the Club (including by direct mail, telephone, SMS / MMS and social media); and including without limitation with respect to food and beverage, promotions, entertainment, wagering, gaming machines, gaming, sporting events and venue hire;
- Analyse usage of food, beverage and other services offered by the Club; and Analyse website and social media usage.

We will only use or disclose your personal information either:

- for the purpose for which it was collected; or
- otherwise with your consent; or
- as required or permitted by law.

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The Club does not disclose personal information overseas unless required or permitted by law.

## **HOW DO WE STORE YOUR PERSONAL INFORMATION?**

The Club is committed to keeping your personal information secure and we will take all reasonable precautions to protect your personal information from unauthorised access, loss, release, misuse or alteration.

All information may be stored in hard copy documents, but is generally stored electronically on the Club's software or systems. Hard copy personal information is stored and archived for a period of seven (7) years.

The Club maintains physical security over its paper and electronic data stores, such as locks and security systems. The Club also uses computer and network security technologies such as firewalls, intrusion prevention software, antivirus software, e-mail filtering and passwords to control and restrict access to authorised staff for approved purposes and to secure personal information from unauthorised access, modification, disclosure, misuse and loss.

The Club will destroy or permanently de-identify personal information if it is no longer needed for the purpose for which it was collected.

Whilst the Club takes all reasonable steps to secure your personal information from loss, misuse and unauthorised access, you acknowledge that all activities in which you intentionally or unintentionally supply information to the Club carries an inherent risk of loss of, misuse of, or unauthorised access to such information.

We protect personal information through the use of secure databases that can only be accessed by authorised individuals. As a matter of course, employees, including those able to access personal information, are bound by the confidentiality clause in their employment contract as well as the confidentiality policy in the staff handbook.

When you post information on social media platforms associated with the Club and its venue, you agree that this information is in the public domain and the Club bears no responsibility in relation to the use of the information by third parties.

## **WHEN MIGHT WE DISCLOSE YOUR PERSONAL INFORMATION?**

The Club may disclose personal information to third parties with whom we contract for the supply or performance of certain products and services in relation to the operation of the Club and with third parties with whom we have a commercial relationship. This may include, but is not limited to:

- Product suppliers who may require the information for fulfilment purposes;
- Mail and e-mail handling services;
- Market research agencies for conducting research on our behalf;
- To suppliers who provide technical support for our database or services;
- To regulators, including reporting of anti-money laundering incidents, or if a patron enters into a ACT Self Exclusion Agreement;
- To others, if the information is required by law;

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In these situations the third party contractor is prohibited from using personal information about you except for the purpose for which it was supplied.

## **HOW CAN YOU ACCESS, CHANGE OR REMOVE YOUR PERSONAL INFORMATION?**

You may access your personal information that is held by the Club by written request to the Club's Privacy Officer (details below).

The Club encourages its members to update or correct personal information so that the information is accurate and up to date. This can be done at Club Reception.

**Opt out:** If, for any reason, you would like to be removed from our mailing lists, please contact one of the following:

- an email to [info@theruc.com.au](mailto:info@theruc.com.au)
- a phone call to the Club 6247 7838

## **HOW CAN YOU RAISE A COMPLAINT ABOUT A BREACH OF PRIVACY?**

The Club is committed to ensuring the security of your personal information and we will take all reasonable precautions to protect this information from loss, misuse or alteration. Should you wish to lodge a complaint regarding the possible breach of the Australia Privacy Principles please contact the Privacy Officer in writing (details below). On receipt of your complaint a review will be conducted and findings will be communicated to you.

## **HOW CAN WE CHANGE THIS POLICY?**

The Club may make changes to this Privacy Policy from time to time for any reason. We will publish those changes on our website, [www.theruc.com.au](http://www.theruc.com.au). Your continued use of our website, products or services, or the provision of further personal information to us after this privacy policy has been revised, constitutes your acceptance of the revised privacy policy.

**For further information contact Jeremy Wilcox, Privacy Officer and Secretary Manager, 6247 7838 or by email [jeremy.wilcox@theruc.com.au](mailto:jeremy.wilcox@theruc.com.au)**