



Privacy Policy

BACKGROUND

The Caloundra Power Boat Club (hereinafter referred to as 'the Club') is committed to safeguarding club members' privacy and ensuring the confidentiality and security of the personal information we may collect from members and others.

To comply with legal requirements and conduct our business, 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 members' dealings with the Club.

SCOPE

The Privacy Policy applies to personal information collected by the Club, as the Club is an applicable organisation under the Privacy Act 1988 (Cth), which governs the way private sector organisations collect, use, keep secure and disclose personal information.

PURPOSE

The Privacy Policy outlines how the Club complies with Australian Privacy Principles (APPs), including:

- 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.

DEFINITIONS

1. Personal information

1.1 What is Personal Information?

- a) 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.
- b) 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.

2. Sensitive Information

2.1 What is Sensitive Information?

- a) Sensitive information is a subset of personal information.
- b) 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, or genetic information.



Policy

We will only use or disclose Members' personal information for the primary purpose it was collected for, unless one has consented to the information being used for a secondary purpose.

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.

1. Collection of personal information

- 1.1. We will only collect personal information that is necessary for us to provide our products and services to you. This depends ultimately upon the purpose of collection and we have set out the general purposes of collection at clause 6 below.
- 1.2. The type of information includes (but is not limited to) the following:
 - a) your contact information, full name (first and last), e-mail address, current postal address, delivery address (if different from) postal address and phone numbers;
 - b) For employees and appointees of the Club only - details relating to your employment (if applicable) or your previous employment, which shall include, but is not limited to, obtaining your tax file number and superannuation details.

Collection of Sensitive Information

- c) In general, we attempt to limit the amount of sensitive information we may collect, but depending on the uses members make of our products and services this may not always be possible and we may collect sensitive information from you in order to carry out the services provided to you.
 - d) We will not collect sensitive information from you without your consent.
- 1.3. 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.
- 1.4. If we receive unsolicited personal information about or relating 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.
- 1.5. If we determine that such information could not have been collected in the same manner as solicited personal information, and that information is not contained in a Commonwealth record, we will, if it is lawful and reasonable to do so, destroy the information or de-identify the information.
- 1.6. From time to time, we may ask you to provide certain information, which you may withhold or provide at your own discretion, e.g., entering a competition.



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2. Identifiers

- 2.1** All government related identifiers, applied to an individual or an organisation are only used by the Club for prescribed circumstances, as required by Government bodies or agencies.
- 2.2** The Club will take all steps necessary to ensure that the any government related identifiers are not disclosed to any other individuals or organisations other than those listed above.

3. Use and disclosure of your personal information

- 3.1** We may also use or disclose your personal information and in doing so we are not required to seek your additional consent:
- (a) when it is disclosed or used for a purpose related to the primary purposes of collection detailed as per Clause 3.1 and you would reasonably expect your personal information to be used or disclosed for such a purpose;
 - (b) 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;
 - (c) if we have reason to suspect that unlawful activity has been, or is being, engaged in; or
 - (d) if it is required or authorised by law.
- 3.2** In the event we propose to use or disclose such personal information other than for reasons in 3.1 above, we will first seek your consent prior to such disclosure or use.

4. Organisations to which we may disclose your personal information

- 4.1** We may disclose your personal information to other organisations. Examples of organisations and/or parties that your personal information may be provided to include:
- (a) other member clubs
 - (b) Clubs Queensland and its related bodies
- Your personal information is disclosed to these organisations and/or parties only in relation to the goods or services we provide to you or for a purpose permitted by this privacy policy.
- 4.2** We take reasonable steps to ensure that these organisations and/or parties are aware of the provisions of this privacy policy in relation to your personal information (under the Australian Privacy Principles) and are committed to the safeguarding of same.



5. Photographs and Closed Circuit Television

- 5.1.** If an incident occurs at the venue, CCTV footage for the period leading up to, during and following the incident must be archived and where no incident has been identified, the CCTV footage is deleted within 30 days after the minimum retention period.
- 5.2.** We may take photographs of you attending our premises, and we may wish to use them for marketing and advertising purposes. Unless you advise us otherwise, you expressly agree and consent to the use of any photographs, which may include you, for the aforementioned purposes, without compensation.

6. Data quality and security

6.1 While we will always take reasonable care 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.

we cannot guarantee the security of personal information stored or transmitted electronically.

6.2 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).

6.3 The Club undertakes an annual review of its members' 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.

6.4 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 whom the club holds personal information for; or
- (c) Notification that a membership has lapsed and is not renewed within the six-month grace period.



7. Notifiable Data Breaches

- 7.1** If the Club suspects that there has been a data breach it will take immediate steps to contain the extent of the breach and limit any further access to the information.
- 7.2** Once the data breach has been contained, the Club will then assess the breach and investigate how the incident occurred within 30 days. Once the club has the relevant information, it will make an evidence-based decision as to whether serious harm is likely.
- 7.3** If it is deemed that serious harm is likely, the Club will notify the individual/s whose data has been breached and the Australian Information Commissioner. The notification will include recommendations as to the steps which should be taken in response.
- 7.4** Where a breach occurs, the Club will review the circumstances surrounding the breach and take action to prevent any further breaches.

8. Storage of personal information

- 8.1** The Club holds physical documents and files which contain personal information in restricted access areas. All files are accessible, strictly by approved personnel.
- 8.2** 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.
- 8.3** All 'back-up' stores are held off site and maintained by contracted IT Service Providers.
- 8.4** 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.

9. Access to and correction of your personal information

- 9.1** 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.
- 9.2** 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.
- 9.3** Prior to accessing any confidential information, you may be required to produce acceptable proof of identity.



10. Consent

- 10.1** 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.
- 10.2** 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.

11. Resolving Privacy Complaints

- 11.1** We will ensure that all complaints are dealt with in a reasonably appropriate timeframe so that any decision is made expeditiously and in a manner that does not compromise the integrity or quality of any such decision.

- If a member has any concerns or complaints about the manner in which the Club has collected, used or disclosed and stored personal information, the member can tell us by contacting the Board Secretary or the Operations Manager.
- **Telephone:** **07 5492 1444**
- **Email:** board.secretary@caloundrapowerboat.com.au
- **Post:** PO Box 1, Golden Beach Qld 4551

To ensure confidentiality, please clearly mark your correspondence to the attention of the Board Secretary or the Operations Manager. 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.

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