

This policy applies to the personal information collected by Tweed Heads Bowls Club Ltd (THBC).

## Applicability

From time to time THBC gathers information from customers and other parties with whom the Club deals with for a variety of reasons, including, in particular, to enable the Club to improve the nature of the services it provide.

THBC understands individuals' concerns regarding confidentiality and takes seriously its obligations in respect of all information it gathers.

## Why THBC Collects Personal Information

The information THBC collects in most cases relates to customers/patrons/members but can relate to suppliers and other parties THBC deal with (for the purposes of this Privacy Policy all such people are described as "customers").

Information is gathered for a range of purposes, including the provision of ongoing customer support and the compiling of customer databases to enable THBC to more accurately market our services. The type of information we collect includes such things as contact details, buying habits, opinions, product preferences and transactional details. THBC treats all such information that is collected and identifiable relating to an individual as "personal information". It is this information that is described as personal Information for the purposes of this Privacy Policy.

## Collection of Information

THBC only collects information that it deems necessary. Where practicable, customers of THBC may deal with THBC on an anonymous basis. However as a provider of a wide range of services, THBC frequently finds that it is necessary to collect personal information during the course of transactions.

Personal information may be collected about customers via the following means:

- competition entry forms
- application forms
- email
- websites
- online transactions
- networking functions (eg business cards)
- over the phone
- credit card details via credit card purchases
- information collected from third parties.

## Information Given to Customers

When personal information is collected from a customer, they are advised at the time of collection, or as soon as practical after its collection, as to:

- THBC's contact details
- the purpose of collection
- the fact that the customer can gain access to the personal information
- the types of organisations to which their personal information may be disclosed
- any law that requires the personal information to be collected
- the key consequences if all or some of the information cannot be collected.

## Sensitive Information

THBC will not ask a customer for information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, or details of health, disability or sexual activity or orientation, unless:

- the customer provides their consent
- the collection of that information is specifically authorised by law
- the collection is necessary to lessen a serious or imminent threat to the health or safety of a person
- the collection of the information is necessary for the establishment, exercise or defence of a legal claim.

## Customer Consent

Wherever practical, THBC will obtain the express consent of customers to the collection of personal information.

## Maintenance and Management of Personal Information

In general, only officers, employees or contractors of THBC may view personal information. THBC will only grant access to parties other than THBC's officers, employees and contractors to view personal information where THBC believes that access is necessary to achieve the purpose for which the personal information was collected.

## Identification

THBC does not use any prohibited identifiers (such as tax file numbers) to identify its customers.

## Storage and Security

Personal information may be stored in either hard copy form or on computer or both. Hard copy personal information is wherever practical, kept under locked security. Personal information stored on computer is wherever practical, password protected.

Where possible and practical, THBC will endeavour to comply with recognised Australian standards relating to information security. THBC regularly deletes and de-identifies personal information if the information is no longer needed by THBC.

## Updating Personal Information

THBC regularly monitors the quality and accuracy of personal information that it maintains and, where practical, updates that information on a regular basis. Customers can update their personal information at any time by contacting THBC's Privacy Officer.

## Competitions

Personal information gathered during competitions run by THBC will be governed by the principles set out in this Privacy Policy unless an express statement is made in relation to privacy in the conditions of the entry for the competition.

## Direct Marketing

Personal information collected for direct marketing purposes will only be collected, used or disclosed with the consent of the relevant customer as provided for in this Privacy Policy. In circumstances where THBC cannot practically obtain the consent of a customer, then THBC may still engage in direct marketing to that customer, but will:

- advise the customer that he or she can be taken off the mailing list at any time
- display its contact details clearly in each direct marketing publication.

Customers may be taken off any mailing list by contacting THBC's Privacy Officer.

## **Access to Personal Information**

Customers may access their personal information by contacting THBC's Privacy Officer. Access is generally granted within 30 days of that request. THBC may impose a reasonable charge for access.

Employees are welcome to access their personal information. Everyone's personal information shall be treated as private and confidential unless otherwise expressly authorised in writing by that person. Employees are required to treat all matters pertaining to their employment and other THBC-related matters as private and confidential unless otherwise expressly authorised in writing by the Privacy Officer.

## **Breach of this Policy**

THBC has an obligation to consistently enforce this policy. Likewise, employees must also enforce this policy through compliance. Any employee that breaches this policy shall be subject to counselling and/or disciplinary action, which may include termination of employment.