

SOUTHPORT AUSTRALIAN RULES FOOTBALL CLUB



PRIVACY POLICY

VERSION: JUNE, 2018



Privacy Policy

Introduction

Southport Australian Rules Football Club Limited ("Southport Sharks" or "we" or "Club") understands that individual privacy is very important, and that each individual ought to have a right of control over their personal information. We therefore act with integrity at all times when dealing with personal information entrusted to our organisation. We take all reasonable steps to ensure that any personal information provided is reasonably protected from misuse, loss, unauthorised access, modification or disclosure, and is maintained by us in an accurate, complete and up to date manner, and in a secure environment. We are committed to ensuring that all personal information held by us is managed in an open and transparent way.

Policy

We are committed to the protection of individuals' privacy in accordance with the *Privacy Act 1988* (Cth) (the "Privacy Act") and the Australian Privacy Principles ("APPs"). This policy (the **Policy**) explains how we manage, collect, use and protect personal information in accordance with the APPs and the Privacy Act.

Unless otherwise specified herein, "personal Information" and "sensitive information" have the same meaning as that term is defined in the Privacy Act:

"personal information" means information or an opinion about an identified individual, or an individual who is reasonably identifiable, or an individual who is reasonably identifiable:

- (a) Whether the information is true or not; and
- (b) Whether the information or opinion is recorded in a material form or not.

sensitive information means:

- (a) information or an opinion about an individual's:
 - (i) racial or ethnic origin; or
 - (ii) political opinions; or
 - (iii) membership of a political association; or
 - (iv) religious beliefs or affiliations; or
 - (v) philosophical beliefs; or
 - (vi) membership of a professional or trade association; or
 - (vii) membership of a trade union; or
 - (viii) sexual orientation or practices; or
 - (ix) criminal record;
- that is also personal information; or
- (b) health information about an individual; or
- (c) genetic information about an individual that is not otherwise health information; or



- (d) biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or
- (e) biometric templates."

Why do we collect, hold, use and disclose personal information?

We obtain personal information in the course of our three main business activities and functions, namely, when:

- managing our membership base and offering goods and services to our members;
- managing accommodation and other hotel services that we offer at Mantra at Sharks; and
- managing and offering goods and services at Southport Sharks Health & Fitness.

We collect, hold, use and disclose personal information in order to facilitate the following actions:

- to process club membership applications for both prospective and existing senior and junior club members;
- to provide you with products and services in respect of your Southport Sharks club membership including when you book functions and/or open a tab;
- to provide you with products and services in respect of your use of Southport Sharks Health & Fitness including when we receive new fitness centre member applications or you undertake personal training sessions at our fitness centre;
- to provide you with products or services arising from your stay at Mantra at Sharks;
- to communicate products, services, competition results, special offers, promotions and events that might interest you;
- to answer any questions and respond to feedback received from members or non-members;
- to create orders, transactions, invoices or receipts;
- to arrange for pick-up or delivery of items;
- to offer rewards for loyalty, and to provide information regarding usage of our products and services;
- to help us improve our website and the services and products we provide; and
- to assess your suitability for employment with us if you are applying for a role.

What kind of personal information does Southport Sharks collect and hold?

Depending on the type of products and services we provide to you and/or receive from you, the personal information that we collect and hold may include:

- members' details including name, address, email address, telephone number, phone numbers, date of birth, gender, member ID, member type, occupation and/or student or healthcare cards;
- prospective and existing employee information including name, address, email, telephone number, mobile number, employee code, headshot, emergency contact details and/or criminal check records;



- creditor and/or customer information including name address, email, telephone number, mobile number, company name or account details to enable us to process payments; and
- health information if you are utilising Southport Sharks Health & Fitness or you rely on a Queensland Healthcare card for discounts.

What kind of sensitive information do we collect and hold?

Depending on the types or products or services that you obtain from us, we may collect sensitive personal information about you. The circumstances in which we collect sensitive information and the type of sensitive information are as follows:

Health information

- we may collect information relating to your Queensland Healthcare Card including its number and your name for the purposes of applying discounts to which you may be entitled;
- we may obtain health information from you when you apply for new membership at Southport Sharks Health & Fitness for the purposes of identifying whether you are at a higher risk of an adverse event during physical activity/exercise whilst using the centre; and
- we may also obtain health information about you when we request that you complete a pre-exercise fitness assessment prior to you undertaking any personal training at Southport Sharks Health & Fitness.

Criminal records

- We may undertake criminal record checks if you are a prospective employee and/or are applying for a role with us.

We will only collect sensitive information about you (including health information and/or criminal records) if you consent to our collection. All sensitive information is collected directly from you. Consent is given when you sign a new member form, become an employee or make a booking in the venue.

We may also collect information about children but only for the purpose of processing junior membership applications. Junior membership application forms must be completed by a parent or guardian. We only rely on the personal information contained within the junior membership application form to send our junior members birthday related offers.

What other information do we collect and hold?

When visiting our website, our web servers will automatically record information that your browser sends. This data may include:

- your computer's IP address;
- date and time of visit;
- browser type used;
- web page you were visiting before you came to our site;
- the pages within our website you visit;



- the time spent on those pages, items and information searched for on our site, access times and dates, and other statistics. This information is collected for analysis and evaluation in order to help us improve our site and the services and products we provide. This data will not be used in association with any other personal information.

The statistics package collates the data into information for use in understanding the usage patterns of visitors to the website but does not identify any individual user during this process.

Our website also utilises cookies. These are small text files that are automatically placed on a user's computer. Cookies themselves do not personally identify users, although they do contain a unique identifier which allows the website to customise content based on a user's previous selections, type of browser or type of computer.

How do we collect and hold personal information?

In addition to the manner in which we collect sensitive information (as outlined above), we may collect your personal information through the following interactions:

- when you use our website;
- when you access our WiFi services within our facilities;
- when you have conversations with our team members;
- when you communicate with us (by email, telephone, direct mail etc.);
- when you make bookings in our restaurants or hotel;
- when you having interactions with us during gaming play, purchases, promotions, competitions, or special events;
- when you sign up to our website newsletter;
- when you complete a membership application;
- when you participate in the Club's Membership Loyalty program (that requires that membership cards be swiped at point of sale or inserted into gaming machines; and
- when you complete employment forms in relation to the recruitment and selection process (for the purpose of assessment).

We may collect sensitive information about you through the use of the following interactions:

- your health information through your use of Southport Sharks Health & Fitness including when you complete a new membership form (that includes a pre-exercise screening form) or when you receive personal training services;
- your health information when you rely on a Queensland Healthcare Card for discounts to which you are entitled; and
- information relating to your criminal record when you apply for a role of employment with us.

We hold your personal information electronically in our internal systems and databases, emails and sometimes in hard copy form. Provision of your personal information is voluntary however we may be unable to provide you with certain products or services if it is not provided.



We are also required by law to collect and hold personal information of every member and visitor to our clubhouse in accordance with section 79 of the *Liquor Act 1992* (Qld) (the **Liquor Act**). Section 79 of the Liquor Act requires our club secretary to keep on the club premises:

- a register of the names and addresses of each member of the club, and particulars of payment of the membership subscription last paid by the member;
- a register of each guest of a member or visitor to the club premises, and the current place of residence of each guest or visitor or, if the guest or visitor is member of a reciprocal club, the name of the reciprocal club.

Under the Liquor Act our secretary must keep the register open for inspection at any time by an investigator.

What do you we do with personal information and to whom is it disclosed?

We often use third party service providers to assist us in our business functions and activities. We may use third parties to:

- store health information that we receive from you when you use Southport Sharks Health & Fitness or request personal training services at Southport Sharks Health & Fitness;
- process payment information and/or direct debits in relation to your membership;
- send email and mail campaigns to you in relation to our services and/or products and services you are entitled to as a member.

Your personal information is treated with the utmost respect for individual privacy, and is not made available to external parties without your consent, save where set out above on the basis that its use or disclosure in those circumstances is directly related to the primary purpose for which we collect it. Where we do disclose your personal information to an external party, we take all reasonable steps to ensure that they handle your personal information in accordance with the APPs.

We limit access to personal information held by us to our employees who need it to carry out our business functions. We also educate our employees about our policies and practices in regard to:

- safeguarding personal information
- preventing unauthorised access, use or disclosure of personal information; and
- ensuring proper handling of personal information.

If we become aware that there has been unauthorised access to or unauthorised disclosure of personal information, or loss of personal information, that is likely to result in serious harm to any of the individuals whose information is involved, and we are unable to take any remedial action that would make serious harm no longer likely, than we will take steps to notify the Office of the Australian Information Commissioner (the **OAIC**) and affected individuals to the extent that we are required to do so under the Privacy Act and in accordance with the APPs.



How do you access your personal information and seek its correction?

You have a right to access and/or correct your personal information held by us.

You may, at any time, lodge a request for correction to your personal information, and we will respond to that request within a reasonable period after it is made. We will not levy a charge for the correction of such information.

Should we for any reason refuse your request for correction of personal information, you will be advised in writing of the grounds for refusal, and notified of available complaint mechanisms.

Complaints Resolution

We are committed to providing a fair and responsive system for handling and resolving complaints. You have the right to complain, and to have your complaint handled efficiently. We believe that in receiving complaints, we are provided with a valuable opportunity to improve the services we deliver and to maintain confidence in us and our services. We undertake to respond to, and/or action, all complaints within 28 days of lodgement

If at any time you wish to lodge a privacy complaint in respect of the handling, use or disclosure of their personal information by us, or make a request for access to or correction of your personal information, you can do so by submitting that your complaint in writing, endorsed "Privacy", and addressing it to Southport Sharks, P.O. Box 1610, Southport. Qld. 4215, or by email to info@southportsharks.com.au,

If you are not satisfied with how we have dealt with your complaint, you may refer the complaint to the Office of the Australian Information Commissioner whose details are below:

The Information Commissioner
GPO Box 5218
Sydney NSW 2001
1300 363 992
www.oaic.gov.au

This Policy was last updated on 4 June 2018,

This Policy may change from time to time. In the event that it is updated, the updated version will be made available on our website at
<https://southportsharks.com.au/privacy/>