

Privacy Policy

PURPOSE

This Privacy Policy is written in accordance with the 13 Australian Privacy Principles under the Privacy Act.

The Club is committed to protecting and maintaining privacy, accuracy and security of all Personal Information and Sensitive Information held by the Club. The Club will take reasonable steps when handling Personal Information and Sensitive Information consistent with our obligations under both the Privacy Act and the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* (Cth).

The purpose of this Privacy Policy is to:

- allow for the open and transparent management of Personal Information and Sensitive Information by detailing how the Club will manage such information;
- ensure that the Club has a clearly expressed and up to date policy that describes how the Club manages Personal Information and Sensitive Information that can be provided to its employees, volunteers, and contractors on request;
- outline employee, contractor and volunteer obligations in relation to privacy of Personal Information and Sensitive Information; and
- ensure the Club complies with applicable laws, regulations and standards.

SCOPE

This Privacy Policy applies to any person, or their nominated representative, who has provided the Club with their Personal Information and/or Sensitive Information, including but not limited to all employees, contractors and volunteers of the Club.

DEFINITIONS

Club means Randwick Golf Club

Personal information has the meaning given to it by section 6(1) of the Privacy Act and means information or an opinion about an identified individual, or an individual who is reasonably identifiable: whether the information or opinion is true or not; and whether the information or opinion is recorded in a material form or not.

Privacy Act means *Privacy Act 1988* (Cth).

Sensitive Information has the meaning given to it by section 6(1) of the Privacy Act and means Personal Information which may include, but is not limited to, information or an opinion about an employee's membership of a professional or trade association, or membership of a trade union, or information about any criminal record or health information of an individual.

MANAGEMENT OF PERSONAL INFORMATION AND/OR SENSITIVE INFORMATION BY THE CLUB

In accordance with the 13 Australian Privacy Principles, this Privacy Policy contains the following information:

1. The kinds of Personal Information and Sensitive Information that the Club collects and holds
2. How the Club collects and holds Personal Information and Sensitive Information
3. The purposes for which the Club collects, holds, uses and discloses Personal Information and Sensitive Information

4. How an individual may access Personal Information and/or Sensitive Information about the individual that is held by the Club and seek the correction of such information
5. How an individual may complain about a breach of the Australian Privacy Principles and how the Club will deal with such a complaint
6. Whether the Club is likely to disclose Personal Information and/or Sensitive Information to overseas recipients

1. The kinds of Personal Information and Sensitive Information that the Club collects and holds

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The kinds of Personal Information and Sensitive Information the Club collects and holds, includes but is not limited to:

- employee, contractor, volunteer, referee and emergency contact details;
- job title;
- photographs or digital images;
- information appearing in identification documents (e.g. passport, drivers license);
- employment contracts, contractor agreement, volunteer arrangements, and other records relating to the terms and conditions of the engagement;
- date of birth, gender, ethnicity and other personal identifiers;
- details of financial and other personal interest supplied by employees, volunteers or contractors, and their immediate family members for the purpose of managing perceived or potential conflicts of interest;
- proof of Australian citizenship, Australian permanent residency or Australian visa;
- educational background and qualifications;
- professional or trade association or union membership;
- insurance details, including but not limited to public liability insurance, workers compensation and professional indemnity insurance;
- for employees – records relating to salary, hours of work, employment benefits, superannuation and leave;
- employment history;
- banking information necessary to pay salary and wages;
- information relating to the employee's training and development;
- performance and misconduct complaints and counselling;
- termination details;
- medical certificates or health related information supplied by an employee or their medical practitioner, including but not limited to medical reports and COVID-19 vaccination status;
- taxation details; and
- details of any civil and criminal history/records.

The Club is required to collect certain information under various workplace laws, taxation laws, superannuation laws and other legislation. If an employee, volunteer or contractor does not provide the Club with any information it requests, it may not be able to fulfil its contractual obligations.

2. How the Club collects and holds Personal Information and Sensitive Information

The Club will collect Personal Information and/or Sensitive Information directly from the employee, volunteer, contractor, or their representative. The main way Personal Information and/or Sensitive Information will be gathered is when the employee, volunteer, contractor or their representative provides us with that information.

The Club will also gain access to your Personal Information and/or Sensitive Information via the Deputy rostering system and Kingstreet payroll system.

The Club holds Personal Information and/or Sensitive Information in both hard copy and electronic formats. In some cases, the Club engages third parties to host electronic data on its behalf this

includes Circle Solutions that holds sign in details for 3 months and MSL Solutions that hosts all Members and Creditors details.

The Club will take all reasonable steps to protect the Personal Information and/or Sensitive Information it holds from misuse or loss. These reasonable steps include but are not limited to:

- any Personal Information and/or Sensitive Information stored on a computer will be stored in a database on cloud which is routinely checked and audited;
- implement technological controls – for example, restriction of access, firewalls, use of encryption, passwords and digital certificates;
- destroying any Personal Information and/or Sensitive Information that is no longer required to be held (if hard copy – by shredding, and if soft copy – by deleting or permanently de-identifying); and
- where records containing Personal Information and/or Sensitive Information are removed from the Club, requiring that they be placed in a plain manila folder which does not identify the person.

The Club endeavours to ensure that Personal Information and Sensitive Information is kept as current as possible and that irrelevant or excessive data is deleted or made anonymous as soon as reasonably practicable. However, some Personal Information and/or Sensitive Information may be retained for varying time periods in order to comply with legal and regulatory obligations and for other legitimate business reasons.

3. The purposes for which the Club collects, holds, uses and discloses Personal Information and Sensitive Information

The Club's human resource function is responsible for maintaining employee records that contain Personal Information and Sensitive Information. The Club will only collect information if it is necessary to carry out the Club functions and activities. The Club aims to collect information that is as non-intrusive and objective as possible.

We may use and disclose your Personal Information and/or Sensitive Information for a variety of reasons. These reasons include, but are not limited to:

- administering payroll;
- improve and maintain the administration of employee benefits and/or other benefits applicable to volunteers and contractors;
- monitor and evaluate employee conduct and performance;
- design, evaluate, implement employee education and training programs;
- administer other human resource programs;
- maintain the security of the Club's facilities;
- maintain the health and safety of employees, volunteers and contractors;
- operate IT and communications systems;
- comply with record keeping and other legal obligations;
- general management of the Club's human resources;
- provide other internal services to our employees, contractors and volunteers; or
- otherwise with the person's consent.

Where consent is required, it will be obtained verbally from the person and noted on the person's file.

The Club will not use or disclose information for direct marketing purposes.

4. How an individual may access Personal Information and/or Sensitive Information about the individual that is held by the Club and seek the correction of such information

The Club will take reasonable steps to ensure that the Personal Information and/or Sensitive Information it collects, uses, holds or discloses is accurate, complete and up-to-date. All Club staff

with access to and who are required to deal with Personal Information and/or Sensitive Information will be made aware of the contents of this Privacy Policy.

Individuals will be allowed access to Personal Information and/or Sensitive Information held about them upon request, unless that access would pose a threat to health and safety of any individual or would unreasonably impact on the privacy of another person. Reasonable steps will be taken to correct any information if it is shown to be inaccurate, incomplete or out-of-date.

An individual may request for information to be corrected if it is inaccurate, out-of-date, incomplete, irrelevant or misleading. If the Club is satisfied this is the case, reasonable steps will be taken in order to correct the information. Requests for Personal Information and/or Sensitive Information must be in writing and all requests will be responded to within a reasonable timeframe.

To seek access to, or correction of, your Personal Information and/or Sensitive Information please contact Kristy Strong, CEO as follows:

By email: kstrong@randwickgolfclub.com.au

By telephone: 02 8347 3777

By mail: 1 Howe Street Malabar NSW 2036

5. How an individual may complain about a breach of the Australian Privacy Principles and how the Club will deal with such a complaint

Complaints regarding the information that the Club collects, uses, holds or discloses should be made in writing to the Club CEO/General Manager. If the person believes there is a breach of this Privacy Policy or the Privacy Act, a written complaint should be made to Kristy Strong, CEO using the contact details provided above. All complaints will be dealt with confidentially and promptly.

The Club will investigate a complaint and inform the individual of the outcome of the investigation as soon as reasonably practicable.

If the individual is not satisfied with the outcome of the complaints process, they should discuss their concerns with an independent advisor or contact the Office of the Australian Information Commissioner at <https://www.oaic.gov.au>.

6. Whether the Club is likely to disclose Personal Information and/or Sensitive Information to overseas recipients

The Club is unlikely to disclose Personal Information and/or Sensitive Information to overseas recipients.

If the Club does disclose Personal Information and/or Sensitive Information to overseas recipients, this transfer will take place if the information is subject to a law, binding scheme, or contract which treats information with a substantially similar integrity as the Australian Privacy Principles. The Club will take reasonable steps and conduct sufficient enquiry in order to ensure this is the case.

Policy Review

The Club may revise or update this Privacy Policy at any time. The Club will notify individuals via email of any revision or updates to this Privacy Policy. Please note that the Club's use of Personal Information and Sensitive Information will be based on the Privacy Policy in effect at the time the information is used.

RESPONSIBILITIES:

All employees, contractors and volunteers of the Club must:

- ensure they act in a manner that is consistent with this Privacy Policy;

- report, as soon as reasonably practicable, any instances where this Privacy Policy has been breached by employees, volunteers, or contractors.

Managers must:

- ensure all employees, contractors and volunteers are aware of this Privacy Policy;
- monitor the application of the Privacy Policy;
- provide advice and guidance to employees, contractors and volunteers on the application of the Privacy Policy; and
- report breaches of the Privacy Policy to the Club CEO.

BREACHING THE PRIVACY POLICY

A breach of the Privacy Policy can result in disciplinary action, up to and including termination of employment, membership, volunteer agreement or contractor agreement, depending on the nature and circumstances of the breach.

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