



## **Privacy Policy**

### **Introduction**

The protection of personal information is important to Christmas Island Golf Club Inc (the Club). The Club is committed to respecting the right to privacy and the protection of personal information.

This document sets out how the Club may collect, hold and use personal information. By providing your personal information to the Club, you consent to its use, storage and disclosure in accordance with this Privacy Policy.

### **Why does the Club collect personal information?**

“Personal information” is information or an opinion (including information forming part of a database), whether true or not, and whether recorded in material form or not, about an individual whose identity is reasonably apparent, or can be reasonably ascertained, from the information or opinion.

The Club collects personal information in order to properly and efficiently carry out its functions. Specifically, to do all things of or incidental to Club membership and otherwise necessary to facilitate and disseminate information relating to Club membership, Constitution rights and obligations, and all Club and golf related activities, operations and functions. Such use includes but is not limited to keeping and maintaining membership and golf records, issuing and maintaining membership accounts; facilitating the provision of products and services, and related marketing and promotion services.

The Club uses personal information only for the purposes for which it was provided and for directly related purposes (unless otherwise required by or authorised under law). We may state a more specific purpose at the point we collect your information.

If you do not provide us with the information that we request, we may not be able to provide you with our products or services.

### **What personal and sensitive information does the Club collect?**

#### **Personal Information**

“Personal information is information or an opinion (including information or an opinion forming part of a database) from which it is possible to determine someone’s identity.

The information collected by the Club about a particular person will vary depending on the circumstances of collection. It may include, but is not limited to, a person’s contact details (name, email and/or postal address, phone number), date of birth, place of birth, gender, driver’s licence number, passport number, insurance details, bank account or credit card details, employment history, school or education institution attended, professional memberships and accreditations, working with children check, parent or guardian contact information, languages spoken, qualifications or communication history with the Club.



## **Sensitive Information**

If it is reasonably necessary in the circumstances, the Club may also collect sensitive information (which is a type of personal information) such as your medical history (including details of any health conditions or any allergies you may have), nationality/ethnicity or disability backgrounds.

Sensitive information is afforded a higher level of privacy protection than other personal information. Where you provide sensitive information to the Club, you also provide consent to the Club collecting it in accordance with this Privacy Policy, unless you tell us otherwise.

## **How does the Club collect personal and sensitive information?**

Information may be collected when you:

- apply to and/or become a member of the Club;
- participate in any golf game or activity, by recording scores or performance;
- join or register for a program of the Club;
- enter personal information into, or agree to having your personal information entered into, one of the Club's online systems or by completing any form provided or made available to you by the Club;
- subscribe to any publication of the Club, including electronic publications;
- provide details to the Club in an application, consent form, survey or feedback form;
- access the Club's website;
- contact the Club via email, telephone or mail or engage with the Club via social media or other form of electronic communication;
- participate in any program, activity, competition or event run, administered or sanctioned by the Club (which may include participants submitting photos or videos);
- purchase tickets to a Club or other sporting event from the Club or an authorised agent;
- purchase merchandise, products or services from the Club or an authorised agent or licensee;
- are elected or appointed to the Board, Committee or a Subcommittee of the Club; or
- apply for employment or a volunteer position with the Club.

Personal information may also be collected where the Club is required to do so by law (for child protection obligations, work health and safety laws, equal opportunity, charitable collections, medical treatment or other legislation in Australia).

## **Providing Information**

Depending on the circumstances, some types of information will be required, and others might be optional. If you do not provide some or all of the information requested, this may affect the Club's ability to communicate with you or provide the requested products or services.

By not providing requested information, you may jeopardise your ability to participate in programs or competitions or apply for employment or volunteer positions with the Club. If it is impracticable for the Club to deal with you as a result of you not providing the requested information or consent, the Club may refuse to do so.



### **Collection from third parties**

The Club may collect personal information regarding a child from the parent or other responsible person associated with that child.

In many circumstances, the Club collects information from third parties.

Examples of such third parties could include, without limitation, Golf Australia, Golf WA, other golf clubs throughout Australia, other members of the Club, schools and other education institutions, Australian Sports Commission, Sport Integrity Australia, non-affiliated organisations or government and law enforcement bodies.

### **Information storage and protection**

The Club stores information in different ways, including in paper and electronic form.

Much of the information we collect from and about our members and from or about people who register their interest in the Club is added to the Club's database. When your information is entered into the Club's database, the information may be combined or linked with other information held about you.

Security of personal information is important to the Club. The Club has taken steps to protect the information we hold from misuse, loss, unauthorised access, modification or disclosure. Some of the security measures the Club uses include strict confidentiality requirements of our employees, volunteers and service providers, security measures for system access and security measures for our website.

We seek to protect your personal information from any unauthorised loss, disclosure or access. However, if a serious data breach occurs, we must notify you if required under the Privacy Act regarding the circumstances of the breach and may also need to advise the Office of the Australian Information Commissioner.

### **How does the Club use personal and sensitive information?**

The Club, and third parties to whom we may disclose personal information in accordance with this Privacy Policy, may use your personal information to do all things of or incidental to Club membership and otherwise necessary to facilitate and disseminate information relating to Club membership, Constitution rights and obligations, and all Club and golf related activities, operations and functions. Such use includes but is not limited to keeping and maintaining membership and golf records, issuing and maintaining membership accounts; facilitating the provision of products and services, and related marketing and promotion services and:

- consider your application for membership;
- verify your identity;
- complete background checks;
- manage and administer your membership;
- adhere to corporate governance requirements;
- research, develop, run, administer, conduct and market events, competitions, programs, activities and other events related to the Club;



- tell you about Club products or services that may interest you;
- research, develop and market products, services, merchandise and special offers made available by us and third parties including but not limited to our licensees, preferred suppliers or sponsors; see Direct marketing;
- enable us, corporate partners, preferred suppliers and sponsors, as well as their related bodies corporate, to market and promote their products and services to you;
- respond to emergency situations involving or requiring medical treatment;
- administer, manage and provide you with access to the Club's website and social media channels;
- administer the Club's member and customer relationship database;
- prepare and distribute the Club's member handbook and newsletters;
- provide you with news and information about the Club and its products and services;
- manage and enhance the Club's products and services;
- investigate your activity that we suspect to be a breach of any of the Club's terms and conditions; and
- keep you informed of news and information relating to various events and golf events and activities of the Club, activities and opportunities via various mediums.

We may use de-identified health information and other sensitive information to carry out research, to prepare submissions to government, or to plan events and activities.

#### **How does the Club disclose personal and sensitive information?**

In order to effectively and properly perform its obligations to you as a member of the Club, the Club may disclose your personal information to a range of organisations and individuals which include, but are not limited to:

- Golf Australia and other bodies that the Club affiliates to;
- our GA-Licensed Service Provider;
- companies we work with in staging events;
- companies we engage to carry out functions and activities on the Club's behalf, including direct marketing; see Direct marketing.
- our third-party service providers in connection with any of the categories of use identified above;
- our professional advisers, including our accountants, auditors and lawyers;
- our insurers;
- other members through the member handbook and newsletters, including your name and phone number in the member handbook unless you advise us otherwise;
- relevant sporting bodies such as Australian Sports Commission, Sport Integrity Australia, and other state sporting bodies; and
- in other circumstances permitted by law; see Other Disclosures.

In some circumstances, personal information may also be disclosed outside of Australia. In such circumstances, the Club will use its best endeavours to ensure such parties are subject to a law, binding scheme or contract which effectively upholds principles for fair handling of the information that are suitably similar to the Australian Privacy Principles.



### **Direct marketing**

The Club may use non-sensitive personal information to provide better services and for marketing purposes (including disclosure of such information to service providers acting on our behalf).

If you do not wish to receive email, SMS or posted offers from the Club, you may opt-out by using the link provided. Alternatively, you may advise us at any time by contacting the Club via the contact details set out in this policy.

### **Other disclosures**

In addition, the Club may also disclose personal information:

- with your express or implied consent;
- when required or authorised by law;
- to an enforcement body when reasonably necessary; or
- to lessen or prevent a threat to an individual or public health or safety.

### **The Club's website**

When users visit the Club's website, our systems may record certain information about their use of the site, including the web pages visited and the time and date of their visit. The Club uses this information to help analyse and improve the performance of the Club's website.

In addition, we may use "cookies" on the Club's website. Cookies are small text files that help a website to remember the preferences of users to improve the experience of using that website. In some cases, the cookies that we use may collect some personal information. The Club will treat this information in the same way as other personal information we collect. You are free to disable cookies on your internet browser to prevent this information being collected; however, you will lose the benefit of the enhanced website experience that the use of cookies may offer.

Websites linked to the Club's website are not subject to the Club's privacy standards, policies or procedures. The Club cannot take any responsibility for the collection, use, disclosure or security of any personal information that you provide to a third-party website.

### **Accessing and seeking correction of information held by the Club**

The Club will take all reasonable steps to ensure the personal information it collects, uses or discloses is accurate, complete and up-to-date. However, we rely on the accuracy of personal information as provided to us both directly and indirectly.

We encourage all users to regularly review and update their personal information. If you would like to access personal information that we hold about you, we require you to put your request in writing. If we do not allow you access to any part of the personal information we hold about you, we will tell you why.

Individuals may also request access to their personal information held by us by making a request via the contact details set out below. We will respond to your request for access within 14 days and endeavour to provide the requested information within 30 days. If you find that the



personal information we hold about you is inaccurate, incomplete or out-of-date, please contact us immediately and we will see that it is corrected.

### **Resolving privacy issues and complaints**

Any issues or complaints in relation to the collection, use, disclosure, quality, security of and access to your personal information may be made to the Club in one of the following ways:

- Write to: PO Box 156, Christmas Island, WA 6798
- By email to [christmasislandgolf@gmail.com](mailto:christmasislandgolf@gmail.com)

We will respond to your complaint within a reasonable period and try to resolve your complaint for you. If we are unable to resolve your complaint or you are unhappy with the outcome, you can contact the Office of Australian Information Commissioner via its enquiries line 1300 363 992 or website <http://www.oaic.gov.au/> to lodge a complaint.

For further information on the Club's management of personal information, please contact the Club.

The Club may amend this Privacy Policy from time to time.