



## PRIVACY POLICY

Policy Number: 5

Approved: August 2019

Version control

### 1.3

Document tracking

Date	Name	Revision
30/10/2017	Kade Morrell	Privacy officer updated.
28/6/2019	Kade Morrell	Definition update.
19/01/2021	Kade Morrell	Privacy officer updated.
05/07/2022	Kade Morrell	Photos for assisting of nomination of the Board

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## Introduction

The Cooma Ex-Services Club (the Club) recognises that the privacy of information is important to people and is committed to safeguarding personal information provided by members, guests and employees.

The Club is obligated to comply with the National Privacy Principles contained in the *Privacy Act 1988 (Cth)* when dealing with personal information.

## Objective

The Privacy Act 1988 contains the Australian Privacy Principles (APPs) that regulate how organisations collect, use, disclose and store personal information and how individuals may access and correct personal information held about them.

This policy sets out how the Club aims to comply with its obligations under the Privacy Act.

## Policy Aims

The purpose of the Policy is to set out the guidelines for the Club, its members, guests and employees to deal with personal information and aim to avoid instances where the privacy of individuals may be adversely affected.

## Definitions

Board	Responsible for the business and affairs of the Club
Directors	Persons elected to the Board by the members.
CEO	A person appointed by the Board to manage the Club.
Employees	Persons employed by the Club.
Member	A financial member of the Club.
Guest	A person who is not a member of the Club using the Clubs facilities.

## Policy statement

The Board has a responsibility to Club members and guests for the conduct of the affairs and activities of Cooma Ex-Services Club. In carrying out its responsibilities, the Board undertakes to serve the interests of all Club members, employees, other stakeholders and the broader community.

This policy sets out guidelines to ensure the Club complies with its obligations under the Privacy Act and the APPs.

## **Collection of Personal Information**

The Cooma Ex-Services Club collects general information about individuals such as name, address, date of birth (D.O.B) and contact details; this information may be required to be collected by the Club under the Corporations Act or Registered Clubs Act. Other information personal to individuals may also be collected from time to time.

For the safety of all members, guests and employees, the Club operates security cameras to monitor the premises and may collect personal information in the course of investigating complaints, incidents or the like.

## **Use of Information**

The Club uses your personal information for the purposes it was given at the time of collection or as set out in this Policy. Uses of personal information may include:

- To identify you;
- To maintain your membership of the Club, or; allow you to be a visitor of the Club;
- Provide information to you, or third parties, as required by law;
- To provide you with information necessary to be an active member of the Club;
- To allow you to enter Club promotions and events;
- Photos used for the purpose of assisting with a member's nomination of the Board;
- To assist the Club in maintaining current products, services and facilities to you.

## **Security**

The Club takes steps to keep personal information we collect secure and accurate. When no longer required personal information is deleted or destroyed.

The Club cannot accept responsibility for the security of information sent through the internet by you to the Club or the Club to you, or third parties, as security of the information cannot be guaranteed.

## **Access**

An individual can request to access the personal information the Club holds about them by contacting the Privacy Officer. The Club will provide you with access to your personal information unless it considers there is a reason under the Privacy Act or other relevant law the Club is to withhold the information.

Please notify the Privacy Officer if you wish to make changes your personal information held by the Club. The Club may refuse to make changes to personal information if it is required by law, in which case you will be sent a statement advising you of the reason of our decision.

## Contact

Privacy Officer  
Operations Manager  
Cooma Ex-Services Club  
106 Vale Street  
Cooma NSW 2630

Email: [operations@coomaexservices.com.au](mailto:operations@coomaexservices.com.au)

Phone: +61 2 6452 1144

## Breach of Policy

The Club has an obligation to consistently apply and enforce this policy. Likewise, Employees must comply with this policy.

Any Employee that breaches this policy shall be subject to counselling and/or disciplinary action which may include termination of employment.

## Dispute

In each case the CEO's decision will be final. Where the employee wishes to dispute the decision they are able to refer the matter to Fair Work Australia (FWA).

Any decisions made by FWA will constitute a resolution to the matter and be binding on both parties.

## Implementation process

This Policy must be approved by a resolution of the Board and recorded in the Board minutes.

This Policy is to be made available to all Directors, the Club's members, and patrons upon request. Key features may be outlined in the Cooma Ex-Services Club's Annual Report. This policy will also be posted on the Club's website.

## **Amendment**

Any amendment to this Policy can only be approved by the Board.

The CEO is responsible for reviewing this Policy on an annual basis to ensure its continued compliance with legal requirements, corporate governance requirements applicable to the Club and the Club Code of Practice, and if necessary, suggesting amendments to the Policy for consideration by the Board.

## **References and related documents**

Privacy Act 1988 (Cth)

Company Constitution of Cooma Ex-Services Club Limited, October 2013

Registered Clubs Act 1976

Corporations Act 2001 (Cth)

Gaming Machines Act 2001

Liquor Act 2007

Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth)

Lotteries and Art Unions Act 1901