



## PRIVACY POLICY

### SCOPE

City Tattersall's Club respects the privacy of all its members and is committed to protecting their personal information. All City Tattersalls Club employees are bound by the National Privacy Principles (NPPs) within the Privacy Act, understand their responsibilities when dealing with and/or storing personal information from our members and comply with this policy.

### IN THIS POLICY:

'members' – refers to members of the Club;

'sensitive information' – refers to information about a person's racial or ethnic origin, political opinions or associations, religious beliefs or affiliations, philosophical beliefs, trade and professional memberships, sexual preferences or practices, criminal record or health information;

'the Club we, us and our' – refer to City Tattersall's Club;

'you and your' – refer to you, the individual whose personal information we may deal with; and

'personal information' – refers to any information or an opinion (whether true or not), from which an individual's identity is apparent, or can reasonably be ascertained.

### OUR PRIVACY PRINCIPLES

The Club is bound to comply with the provisions set in the Privacy Act 1988 (the Act) which regulates the collection, storage, quality, use and disclosure of personal information. City Tattersalls Club has adopted internal policies and procedures to ensure that your personal information is dealt with in accordance with the NPPs contained within the Privacy Act. You can see the full text of the NPPs online at [www.privacy.gov.au](http://www.privacy.gov.au)

### COLLECTION OF INFORMATION

We will ask you to provide us with your personal information when you:

- apply to become a member of the Club;
- make an inquiry, where your personal details are required to verify your identity in order to fulfil the query;
- contact us online at [members@citytatts.com.au](mailto:members@citytatts.com.au)

### MEMBERS

The personal information provided by you on the Membership application and/or renewal form will be used to process your Membership or renewal application. Failure to provide all of the requested information may result in your application being rejected. You have a right to access and correct any of your personal information that the Club holds about you. This information will generally include the following:

- First Name and Last name
- Residential Address
- Date of birth
- Proof of Identification received
- Contact details (phone/ email)

### GUESTS AND VISITORS

Under the Registered Clubs Act Patrons visiting the Club are required to produce suitable identification to gain entry to the premises. Suitable identification is primarily Driver's License, Passport and Proof of Age Cards.

## **USE - GENERAL**

We will use your personal information to improve our services to members and their guests;

- where reasonably required to provide anything that the Club provides to members and their guests;
- to derive or aggregate anonymous information from which you cannot be identified as an individual;
- to prevent or lessen a threat to a person's life or health;
- where disclosure is reasonably necessary for the establishment, exercise or defence of a legal or equitable claim
- for the purpose for which it was collected, or for a related purpose (where the personal information is sensitive information, the related purpose will be a directly related purpose) that you would reasonably expect from us;
- for other purposes permitted, required or authorised by or under law; and
- for any other purpose, where you have consented to its use for that purpose.

## **USE - MEMBERS**

Your personal information may be used by the Club for marketing purposes to improve our services including promotions, events and functions. Where City Tattersalls Club uses direct marketing to its members (including direct mail, email, telephone or SMS) we will ensure that there is provision to 'opt out' from receiving any further direct marketing.

## **SENSITIVE INFORMATION**

We are particularly concerned where we need to deal with sensitive information and will ensure it is dealt with appropriately. We may need to collect your sensitive information in some circumstances and for specific purposes (e.g., where it is necessary for the establishment, exercise or defence of a legal or equitable claim and we have agreed to provide associated legal services). Where we are at liberty to do so, and it is practicable to do so, we will seek your consent before collecting your sensitive information and inform you of the purpose at the same time.

## **DISCLOSURE**

We will not disclose your personal information to a third party unless:

- the disclosure is for a primary purpose for which the information was collected and that you have consented to the disclosure;
- the third party is our agent or contractor, in which case we will require them to keep your personal information confidential and to use it only for the purpose for which it was disclosed;
- there are reasonable grounds to believe that disclosure is necessary to prevent or lessen a threat to your life or health or that of another person;
- the disclosure is to a related body corporate;
- the disclosure is reasonably necessary for the establishment, exercise or defence of a legal or equitable claim; or
- the disclosure is permitted, required or authorised by or under law.

## **OUR WEBSITE**

To ensure we meet the needs and wants of our website users, and to develop our online services, we may collect aggregated information using cookies. Cookies will track your use of our web site, and may also be used to compile statistics on visits to the site in an aggregated form and log anonymous information such as:

- the address of your server,
- your top level domain (such as '.com' '.net' or '.au')
- the date and time of your visit
- the pages you accessed and downloaded
- the search engine you used
- the type of browser which was used

When you visit our site a Cookie may be placed on your device. If you have visited our site previously, the Cookie may be read each time you re-visit the site. We do not use this technology to access your personal information

and you cannot be personally identified from a Cookie. If you choose not to have your browser accept Cookies from our site, you will still be able to view the text on your screen.

## **MARKETING**

From time to time, we may advise you of new services and marketing initiatives that we think may be of interest to you. This may include newsletters and general information about the Club. If you would prefer not to receive such communications from us, please contact our Privacy Officer to be removed from the relevant circulation list. Contact details for our Privacy Officer are included at the end of this policy. Please note that we may require written confirmation of your request, for example where legislation requires us to provide particular communications to you.

By providing your contact details you give permission to be contacted for marketing purposes. Your consent may be withdrawn at any time by written notice to the Club or emailing [members@citytatts.com.au](mailto:members@citytatts.com.au).

## **ACCESS TO YOUR PERSONAL INFORMATION**

If you request access to your personal information we will endeavour to provide you access in a form and manner suitable to your needs, subject to "Restrictions on Access" below.

To request access please contact our Privacy Officer. Contact details for our Privacy Officer are included at the end of this policy.

## **RESTRICTIONS ON ACCESS**

Where providing access would reveal evaluative information generated within the Club in connection with a commercially sensitive decision-making process, the Club may give you an explanation for the decision not to provide access, rather than direct access to the information.

If we have given you an explanation for the decision not to provide access and you have an ongoing belief that direct access is necessary, we will, at your written request, review the decision. Personnel other than the original decision-maker will conduct the review.

If direct access by you is impractical or inappropriate, we should consider together whether the use of mutually agreed intermediaries would allow sufficient access to meet both our needs.

The Act recognises that there are some situations where it is not appropriate to provide you with access. Examples include (however are not limited to):

- where providing access would pose a serious and imminent threat to the life or health of any individual
- where providing access would have an unreasonable impact upon the privacy of other individuals;
- the request for access is frivolous or vexatious;
- the information relates to an anticipated or existing legal dispute and disclosure would compromise the Clubs position.

## **CHARGES FOR ACCESS**

If the Club levies charges for providing access to personal information, those charges will be reasonable. We will not charge you for lodging a request for access. We will provide an estimate of charges to you if requested, or if it appears that the work will be onerous or otherwise warrants charges.

## **CORRECTION OF RECORDS**

If we hold your personal information and you notify us that it is not accurate, complete or up-to-date, we will take reasonable steps to correct the information in the manner that you have requested. If we consider that the information we retain does not require amendment, we will annotate your request on our files.

## **SECURITY**

We are committed to maintaining safeguards to protect personal information against unauthorised use, disclosure, access, alteration, destruction and accidental loss. All personal information we hold is dealt with in accordance with the NPP's, industry standards for the security and protection of information. Your personal information is stored securely and access is restricted to authorised personnel only. Our computer systems require access passwords, and these are kept secure; internal policies on management of personal information

and staff training to ensure compliance with these policies. All our staff are required to read this policy and understand their responsibilities in relation to your personal information.

## **SURVEILLANCE**

Within designated areas of the City Tattersalls Club, members and guests will be subject to video surveillance (CCTV) for security purposes. Details of any suspected and/or actual illegal or undesirable activities taken place on the Club premises may be shared with law enforcement and regulatory bodies such as the Office of Liquor, Gaming and Racing and the Independent Liquor and Gaming Authority.

## **OVERSEAS TRANSFER**

We will not transfer your personal information outside Australia unless:

- we reasonably believe that the recipient of the information is subject to legal obligations that uphold principles for the protection and fair handling of personal information that are substantially similar to the principles contained in this policy;
- you make a booking with another organisation, where the Club has an agreement as to reciprocity with the organisation and is requested to provide your personal information to the other organisation in connection with your booking. In this instance we will advise you to whom your information has been disclosed as soon as practicable;
- you give us your consent to do so, expressly or by implication;
- we are contractually required to do so; or
- the transfer is for your benefit and it is not practicable for the Club to obtain your consent and if you were able to grant consent, you would be likely to give it. In this instance we will advise you to whom your information has been disclosed as soon as practicable.

## **FREQUENTLY ASKED QUESTIONS**

We do not disclose a member's personal information to third parties. Exceptions include where we are required to disclose confidential information by force of law, and where the third party agrees only to use or disclose the information as authorised by the Club.

We will never disclose any personal information except in accordance with this policy.

If you do not wish to provide us with all the personal information we request from you, we may not have sufficient information to comply with our obligations under various legislation including the Registered Clubs Act, or our own administrative procedures required for prudent management of the Club's operations.

## **CHANGES TO OUR POLICY**

We may update or change this policy from time to time. When we do so, we will publish the current policy on our website, and make it available in hard copy on request at 194-204 Pitt Street, Sydney or by contacting our Privacy Officer.

If you have any suggestions or concerns that are not addressed in this privacy policy, please contact our Privacy Officer.

Contact details for our Privacy Officer are included at the end of this policy.

## **COMPLAINT RESOLUTION**

We are committed to constantly improving our procedures so that your personal information is treated appropriately.

If you believe we have failed to deal with your personal information in accordance with the NPPs or this policy, please express your concerns with us directly so that we have an opportunity to resolve the issue to your satisfaction.

The appropriate person to contact is our Privacy Officer.

Our Privacy Officer will manage the following process for us to:

- listen to your concerns and grievances regarding our handling of your personal information;
- discuss with you the ways in which we can remedy the situation; and
- put in place an action plan to resolve your complaint and improve our information handling procedures if appropriate.

If this process does not result in an outcome that is satisfactory to you, you may contact the Privacy Commissioner's Office. We will work together with the Privacy Commissioner's Office to resolve the issues between us.

#### **PRIVACY OFFICER CONTACT INFORMATION**

If you wish to access any personal information of yours that we are storing, or have a query about this policy, please our Privacy Officer.

At the date this Policy was last updated, our Privacy Officer is Mark Cooper, whose contact details in Sydney, Australia are:

Tel: 9267 9421 Fax: 9261 3593  
Email: [markc@citytatts.com.au](mailto:markc@citytatts.com.au)  
Post: The Privacy Officer  
City Tattersall's Club  
194-204 Pitt Street  
Sydney NSW 2000