

BOARD POLICY ON PRIVACY – CUMBERLAND COUNTRY GOLF CLUB LTD (CCGC)

1 Scope & Purpose

- 1.1 The Board of Cumberland Country Golf Club Limited (CCGC) has resolved that CCGC shall be bound by the National Privacy Principles (NPP) as specified by the Privacy Act 1988, as amended. The confidence of the members in protecting their personal information is fundamental to the Golf Club's relationship with its members. The Golf Club shall aim to maintain the highest standards of confidentiality of the information it receives, or collects.
- 1.2 This policy is effective from the 21 December 2001, the date of commencement of the Privacy Act 1988, as it applies to personal information.
- 1.3 This policy shall be displayed in the office of the Golf Club and on the web site of CCGC. Members of CCGC and other persons shall be able to obtain a copy of the policy on application.
- 1.4 All employees shall be informed of this policy and the application of the NPPs through training programmes on commencement of employment and at regular intervals thereafter. Adherence to the NPPs shall be a condition of the employment with breach of the principles or this policy to be grounds for disciplinary action.

2 Definitions

- 2.1 The National Privacy Principles as summarised by the Privacy Commissioner are as follows.

NPP 1 – Collection

Collection of personal information must be fair, lawful and not intrusive. A person must be told the organisation's name, the purpose of collection, that the person can get access to their personal information and what happens if the person does not give the information.

NPP 2 – Use & Disclosure

An organisation should only use or disclose information for the purpose it was collected unless the person has consented, or the secondary purpose is related to the primary purpose and a person would reasonably expect such use or disclosure, or the use is for direct marketing in specified circumstances, or in circumstances related to public interest such as law enforcement.

NPP 3 – Data Quality

An organisation must take reasonable steps to make sure that the personal information it collects, uses or discloses is accurate, complete and up-to date.

NPP 4 – Data Security

An organisation must take reasonable steps to protect the personal information it holds from misuse and loss and from unauthorised access modification or disclosure.

NPP 5 – Openness

An organisation must have a policy document outlining its information handling practices and make this available to anyone who asks.

NPP 6 – Access & Correction

Generally speaking, an organisation must give an individual access to personal information it holds about that individual on request.

NPP 7 – Identifiers

Generally speaking an organisation must not adopt, use or disclose, an identifier that has been assigned by a Commonwealth government 'agency'.

NPP 8 – Anonymity

Organisations must give people the option to interact anonymously whenever it is lawful and practicable to do.

NPP 9 – Transborder Data Flows

An organisation can only transfer personal information to a recipient in a foreign country in circumstances where the information will have appropriate protection.

NPP 10 – Sensitive Information

An organisation must not collect sensitive information unless the individual has consented, it is required by law.

2.2 **Sensitive information** is 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 preferences or practices; or
- (ix) criminal record;
- (x) health information, about health or disability at any time; or expressed wishes about the future provision of health services to him or her; or health services provided or to be provided to the individual.

3 Information Collected

- 3.1 CCGC shall only collect from a member such information that is necessary for the conduct of its business or as required by law. This will include the full name and residential address, postal and email addresses of the member, telephone, mobile telephone and facsimile numbers.
- 3.2 Other golf specific information such as previous club or handicap shall be obtained on the membership application form.
- 3.3 Where Leave of Absence is approved by the Board, the fact, the reason and the date of approval, will be recorded in the history section. When the member resumes a financial playing membership the history file is to be expunged.
- 3.4 Where members or visitors sign for a jackpot collection on the poker machines, the name and membership number is to be taken. Such information is to be kept confidential to the staff member who signs for the payment and should not be discussed with anyone.
- 3.5 Personal information contained in Temporary Member or Guest of Member registers is required by Law and is not disclosed to any person who under the Law is not entitled to that information.
- 3.6 Information on a person's health will be collected only **with the consent of the member**.

Member consent to the collection of sensitive information shall be obtained at the time of collection.

We will only seek details of a member's health when a member requests leave of absence or applies to use his/her personal golf cart on the course. Such information will be retained on a member's computerised history file. When the member resumes a playing membership or ceases to require the use of his/her personal golf cart the history file will be expunged.

- 3.7 Where information is received on third parties in connection with a member application or request, the other person shall be informed in writing of the information held as soon as practicable unless consent is obtained beforehand.
- 3.8 Information may only be used to provide related golfing, social or promotions to the member. Use or disclosure of personal information about an individual shall only be for the purpose of the Golf Club's business. The Golf Club business shall include market analysis, detecting or preventing fraud or other criminal activity.

Use or disclosure of the data for other purposes, shall only be undertaken if the member has consented to the use or disclosure, or after being considered and approved by the privacy officer as being related to the purpose of collection or approved by Law.

- 3.9 Consistent with Golf Clubs, CCGC use third party suppliers to conduct specialised activities. The types of organisations we use include printing and legal services. These suppliers act as our agents for specific activities and shall be bound by confidentiality and non disclosure agreements. The information supplied to them shall remain the property of the CCGC, and they shall be contracted to respect the privacy of the information they receive through the

agreements signed with us. They shall not be permitted to use information supplied by CCGC for their own use, or the use of others.

- 3.10 Third party suppliers shall be monitored for compliance with the NPPs and any breach of the principles considered in the context of future dealings with the organisation. Where an organisation is not bound by the NPPs the Golf Club shall review the relationship and the risk of the information being compromised. If the risk is considered significant then the relationship shall be reviewed.

4 Online Privacy Issues

- 4.1 To the extent that the other sections of this Privacy Policy apply to online privacy issues, they form part of the terms of use for any website operated by us. This section of the policy provides information specifically relating to websites operated by us.

4.2 Online collection of personal and aggregated data

We will collect personal information from web sites operated by us where you register for email bulletin services, register as a member or purchase goods or services through the web site. We will use this information for providing the relevant service to you and in other ways described in this policy.

We may also collect other information when you access a web site operated by us - some of this is personal information and some of it is not - to optimise our goods and services including our web pages for your computer. This information will include the identity of your internet browser, the type of operating system you use, your IP address and the domain name of your internet service provider.

This information is aggregated for reporting purposes. Personal identifiable characteristics are removed and users remain anonymous unless you have provided express consent to us to recognise your usage. This data is gathered by us to examine internet trends and demographics and to assist in improving web sites operated by us, and may be provided to third parties for marketing and research purposes.

4.3 Cookies

To enhance your experience with web sites operated by us, many of our web pages use "cookies". Cookies are text files that a web site transfers to your computer's hard drive for record keeping purposes. Web sites operated by us use cookies to support your current activity on the web site by providing a unique identifier in order to allow our web server to distinguish your web browser from any other web browser accessing the web site, and to customise the web site for you. They also allow us to follow usage patterns and compile data that may help us improve the web site and targeting advertising. Cookies by themselves do not tell us your e-mail address or other personal information. However, once you choose to provide the web site with personal information this information may be linked to data stored in the cookie.

You should adjust the settings in your web browser if you do not want information collected through the use of cookies. However, this may slow down or restrict access to parts of the web site.

4.4 Links to other web sites

Some of the web sites operated by us contain links to third party web sites, being advertisers, sponsors or other companies that we have a relationship with. Although a web site may be linked to a web site operated by us, we are not responsible for the privacy practices of the linked web site. Any concern that you may have in relation to privacy policies of a linked third party web site should be directed to the operator of that web site.

4.5 Online disclosures

From time to time we may have relationships with other companies that we allow to place advertisements on web pages of sites operated by us. As a result, when you visit a web site operated by us, advertising server companies may collect information such as your domain type, IP address and clickstream information.

4.6 Public forums

Web sites operated by us may make chat rooms, forums, message boards and/or news groups available to you. Any information through these channels becomes public information and you should exercise caution in disclosing personal information. Whenever you disclose personal information through these channels, this information can be collected and used by others.

4.7 Promotional e-mail

If you are receiving promotional e-mail from us and you no longer wish to receive this information, please e-mail us and we will ensure that you no longer receive this information.

5 Access to information

5.1 Members shall have a ready means of being able to contact CCGC so access the information to confirm its correctness, and to lodge requests for amendment of the records where necessary. The Golf Club shall establish a procedure to handle the requests for information, and provide a means of contacting the Golf Club by mail, email or phone.

6 Right to Opt out

6.1 If members do not wish the personal information held by the Golf Club, to be available for CCGC promotional purposes, the members shall have the right to opt out by contacting the Golf Club to discontinue the issue of this information to them. The opt out request shall be recorded in the data files on the member and be applied to all promotions. The ability to opt out shall be readily available and promoted in all promotion material. The Opt Out process shall not apply to material issued through and newsletters sent to members periodically or the annual report, since these material contain information and notices prescribed at Law, or by the Constitution of the Golf Club.

7 Information Security

7.1 CCGC staff shall be committed to maintaining the confidentiality of the personal information we collect, and the Golf Club take all reasonable precautions to

protect the information from loss, misuse, or unauthorised alteration. Internal systems monitor the access and changes to the data.

- 7.2 Data held on the Golf Club data files or are stored in back up systems for disaster recovery purposes, shall be protected from unauthorised access.
- 7.3 The Golf Club shall use its best endeavours to ensure that security systems use the most up to date technology to protect the information transmitted. The systems shall be monitored regularly for improvements.
- 7.4 All personal information shall be destroyed in a confidential and secure manner. Electronic data shall be destroyed by removal from the data files in a manner which prevents retrieval.

8 Dispute Resolution and Complaints

- 8.1 The Golf Club shall establish a dispute resolution procedure to deal with complaints and disputes regarding the information stored and used by the Golf Club. The procedures shall allow complaints to be dealt with by the privacy officer, and provide the means to have the matter dealt with by the General Manager if the matter is not resolved in a timely manner.
- 8.2 Where a matter cannot be resolved within the period of 30 days, the member shall be kept informed of the progress of the dispute.

9 Privacy Officer

- 9.1 The Golf Club has appointed a privacy officer with responsibility for
 1. Overseeing the implementation of all privacy procedures and that the scheme is running effectively, including
 - Handling requests for details of member information by government agencies, or
 - Handling requests by members to access confidential information in the Golf Club,
 - Handling complaints concerning the privacy laws
 2. Reviewing the internal procedures for maintaining consistency of dealing in personal information and the keeping of appropriate records in a secure manner.
 3. Reviewing the internal procedures for maintaining the records of members who elect not to receive marketing information.
 4. Members shall be notified the appropriate contact details of the privacy officer in each disclosure statement.