

# Membership and Employee Privacy Policy

## 1. Policy Principles

In the course of business, Cazalys NT Group (the Club) collects and uses a range of personal information relating to the extent of an individual's use of (and preferences in relation to) goods and services offered by, or available at or from the Club, and other information relevant to providing individuals with the services they are seeking.

The Club takes member and employee privacy seriously and is committed to protecting the privacy of individuals' personal information. The Club encourages everyone to read this policy carefully. It will help make informed decisions about sharing personal information with the Club.

A copy of this Privacy Policy will be made available to anyone upon request.

## 2. Purpose

This Privacy Policy sets out the principles that the Club will follow in the management of the personal information of individuals. This Policy exists to protect members' and employees' personal information.

This policy explains the types of personal information that the Club may collect and hold, how that information is used and with whom the information is shared. It also sets out how individuals can contact the Club if they have any queries or concerns about this information.

## 3. Scope

This policy applies to all members, guests, temporary members, Directors, employees and contractors.

## 4. Legislation

The Club is bound by the 13 Australian Privacy Principles (APPs) of the *Privacy Act 1988* (Commonwealth) (the Act) as amended, to govern its collection, usage and disposal of personal information. The APPs are designed to protect the confidentiality of information and the privacy of individuals by regulating the way personal information is collected, used, disclosed and managed.

The Club will only collect, use or disclose information in accordance with this Act and this Privacy Policy.

## 5. Responsibilities

**The General Manager** is responsible for:

- Actioning any complaints or concerns raised by individuals in relation to breaches of the Act or APPs, or about the use or disclosure of personal information.

**Team members** are responsible for:

- Ensuring individual's personal information is only used as set out in this Policy.

## 6. Collection of Personal Information

Personal information is generally defined as information or an opinion that can identify a person. The types of personal information collected by the Club will depend on the relationship that the individual may have with Club. For example, Management may require certain specific information about the individual should

they apply for employment with the Club (eg employment or training history) which is different from the information supplied if an individual is entering a competition or joining a loyalty program. The Club will only collect information from an individual directly and from their use of the Club's products and services.

## **7. Types of Personal Information Collected**

The most common situations where the Club may collect personal information from an individual may include entry conditions, gaming procedures and regulations, loyalty programs, marketing and promotions, accommodation bookings, employment applications, social media and situations where the law requires.

The most common types of personal information the Club may collect include:

- identification information such as a person's name, address and date of birth.
- contact details such as email address and phone numbers.
- financial details such as tax file number, superannuation details and bank details.
- employment-related details such as training qualifications, criminal history checks, disability or health related information that relates to the ability to fulfil the requirements of the position.

The Club may also collect and use copies of documents to confirm personal identity. Typically, this will relate to the person's identity as verified by a driver's licence or passport.

In the interest of safety and security the Club operates video cameras within the Club's premises and may collect personal information in the course of investigating incidents, complaints or pursuing disciplinary proceedings.

## **8. Use and Disclosure of Personal Information**

The Club will only use or disclose personal information for the purpose which was either specified or reasonably apparent at the time of collection. The Club may also use or disclose it for any other related purpose for which an individual would reasonably expect it to be used. The Club may also use personal information to send marketing or promotional material to an individual, unless they indicate to the Club that they do not wish to receive that type of information. The Club may also use personal information assist in investigation of security incidents, complaints or illegal activities.

The Cazalys NT Group does not disclose personal information to third parties except:

- where third party contractors appointed by the Club require access to personal information held by the Club to perform services for the Club or on its behalf;
- where the Club is required or authorised by law; or
- with the individual's consent.

Should third parties be given access to personal information in such a case, the Club requires that contractors are obliged to keep that personal information confidential and not to use or disclose it for any purpose other than performing services for the Club or on the Club's behalf.

## **9. Website Users**

The Club may collect "clickstream" information (eg which areas of the website an individual have accessed, the time and date of access, the type of browser software used) from their use of the website. The Club may also store "cookie" information (such as user preferences relating to their use of the website) on their computer. That information is used to customise and improve the Club's website.

The Club does not use “cookies” to retrieve information from an individual’s computer that was not originally sent by the Club. The Club does not allow or share third party access to “cookies” placed by the Club’s website. If an individual does not want the Club to store “cookie” information on their computer, an individual can adjust the settings on their Internet browser to disable this feature. However, parts of the website will not function if “cookies” have been disabled.

## **10. Security of Personal Information**

The Club will take reasonable steps to protect the personal information it collects and ensure it is accurate and complete. Information is held on secure servers or within controlled environments. The Club’s employees are required to maintain the confidentiality of any personal information held by Club.

## **11. Access to Personal Information**

An individual has the right to access personal information that the Club holds about them. There are a limited number of circumstances in which the Club may decline to grant an individual access and these are outlined in the Act.

The Club will provide access to an individual’s personal information within 30 days of a written request. Management will inform the individual if a cost applies to finding this information before performing this task. Requests for access should be made in writing to the General Manager.

## **12. Changing Personal Information**

The Club will take all reasonable steps to ensure that personal information it uses is accurate and complete. If an individual wishes to change personal information that is inaccurate or out-of-date, they may write (via email) to the Club and the record will be changed.

## **13. Complaints**

If an individual wishes to make a complaint about a breach of the Australian Privacy Principles or Act, please contact the General Manager at [gm@cazalsnt.com.au](mailto:gm@cazalsnt.com.au).

If the complaint is not resolved by the General Manager, or the individual does not wish to contact the General Manager, they can make an application to the Office of the Australian Information Commissioner at GPO Box 5218, Sydney, NSW 2001.

## **14. Amendments to This Policy**

The Board of the Club may amend this Privacy Policy from time to time at its discretion. For a copy of the most recent version of this policy, please contact the General Manager.

## **15. Questions About Privacy**

If an individual has any questions or concerns about the Club’s use or disclosure of personal information, please contact the General Manager.

A copy of this Privacy Policy will be made available to anyone upon request.

For further information about privacy issues, please refer to the Office of the Australian Information Commissioner’s website at [www.privacy.gov.au](http://www.privacy.gov.au).