



Privacy Policy of Castle Hill RSL Swimming Club

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Who does this policy apply to and what does it cover?

This policy sets out how Castle Hill RSL Swimming Club (“**CHRSLSC**”, “**we**”, “**us**” or “**our**”) collect, use, disclose and hold “personal information”.

“Personal information” means information or an opinion about an individual (who can reasonably be identified), whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not.

What is our privacy commitment to you?

We are committed to complying with our obligations under the *Privacy Act 1988 (Cth)* (**Privacy Act**) by protecting the privacy and confidentiality of your personal information.

When we collect, use, disclose, store, access or correct your personal information, our actions will comply with the Privacy Act and the *Australian Privacy Principles*.

Where appropriate, we will handle your personal information relying on the related bodies corporate exemption in the Privacy Act.

What kinds of personal information does CHRSLSC collect and hold?

We may collect and hold a wide range of personal information, and in some cases sensitive information, including:

- your personal details, including your full name, residential address, email address, contact number, RSL membership number, date of birth and gender;
- your signature;
- your swimming record;
- health information, including any medical conditions that you may disclose to us to enable us to provide goods or services or access to our facilities to you, in particular in connection with the Castle Hill Aquatic Centre;
- the name and contact details of your next of kin;

Wherever practicable, we will advise you of the information being collected about you and provide you with an opportunity to refuse the collection of that information.

How do we collect your personal information?

Your personal information is collected as a result of joining CHRSLSC. Information is collected by recording information that you provide to us, by paper or electronic. We collect personal information when you:

Will I be notified that my personal information is being collected?

When we collect information from you, we will take reasonable steps to notify you (or otherwise ensure that you are aware) of the following:

- our identity and contact details;
- the facts and circumstances of the collection;
- details of any laws that require or authorise the collection;
- the purposes of the collection;
- the consequences if we do not collect the information;
- that this policy contains information about how you can access or correct your information or make a complaint about CHRSLSC; and

One way we notify you of the above is by making you aware of this policy.

Is CHRSLSC required by law to collect personal information?

As a registered club, we have a legal responsibility to collect certain information about our members and guests pursuant to legislation, including the *Registered Clubs Act 1976 (NSW)* (**Registered Clubs Act**), *Corporations Act 2001 (Cth)* (**Corporations Act**), *Gaming Machines Act 2001 (NSW)*, *Liquor Act 2007 (NSW)*, *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)* and *Work Health and Safety Act 2011 (NSW)*.

For what purposes does CHRSLSC collect, hold, use and disclose your personal information?

We collect, hold, use and disclose your personal information to operate CHRSLSC and its various businesses, carry out certain activities, provide products and services to you, other members and guests and other members of the public, and comply with our legal obligations. The purpose of collecting your personal information is to undertake one or more of the following activities or functions:

- consider applications and renewals of membership with CHRSLSC
- create registers and display information as required by the Registered Clubs Act;
- provide a safe environment for you and other members;
- assess your suitability to participate in certain activities and services provided by CHRSLSC, having regard to your state of health and fitness;

- carry out accounting, financial and administrative activities and functions and comply with our legal and administrative reporting requirements;
- provide an events management service;
- operate functions at our venues;
- carry out competitions and promotions;
- publish and distribute newsletters;
- offer and manage sponsorships including by supporting community sports and social events;
- provide ticketing services;
- conduct elections of the Board;
- improve our services and increase membership of CHRSLSC; and/or
- provide you with updates and information about our proposed development.

What happens if you don't provide your personal information?

If you don't give CHRSLSC your personal information, you may not be able to become a member of CHRSLSC, join CHRSLSC's activities.

In most circumstances, you will be unable to deal with CHRSLSC anonymously or with a pseudonym because of our obligations under the Registered Clubs Act.

How do we use your personal information?

We use your personal information primarily to allow us to carry out the activities and functions listed above. We also use your personal information for secondary purposes related to those activities and functions, or when permitted under the Privacy Act.

To the extent that CHRSLSC collects health information from you, CHRSLSC will treat that information as confidential and only ever handle your health information in accordance with CHRSLSC's policies, the Privacy Act and the *Health Records and Information Privacy Act 2002* (NSW).

Does CHRSLSC disclose my personal information to others?

There may be times when we may need to disclose your personal information to third parties that we engage to provide services to or in connection with CHRSLSC, including our related entities, our insurers, our sponsors, our legal or financial advisers and other Club members.

Your personal information will only be disclosed to third parties for a purpose permitted by the Privacy Act and/or this policy and, where required, after obtaining your consent.

We may need to disclose your personal information to third parties for the purposes of allowing us to carry out the activities and functions mentioned in this policy.

For example, from time to time, CHRSLSC engages external companies to send direct marketing information (usually via email or SMS), carry out mail services, and provide IT storage and other services.

A third party will only receive your personal information from CHRSLSC where that

information is necessary for that third party to provide services to or in connection with CHRSLSC and CHRSLSC will always require that the third party comply with the Privacy Act when dealing with your personal information.

We will also disclose your personal information to third parties if we are required or authorised to do so by law, including to law enforcement agencies, the Office of the Australian Information Commissioner, the Australian Electoral Commission, the Department of Communities and Justice and the Australian Taxation Office.

CHRSLSC will never disclose your health information to a third party without your express consent, except in the event of a medical emergency or as otherwise permitted by law.

FREQUENTLY ASKED QUESTIONS

Why does CHRSLSC collect my health information?

CHRSLSC's primary concern is the safety and wellbeing of its staff, members and the broader community which it serves.

CHRSLSC may need collect personal information from you about your health in order to safely provide specific services to you. For example, if you wish to participate in a sporting activity, CHRSLSC may require you to disclose information about your general fitness and any medical conditions that you may have in order to assess whether it is safe for you to participate in that activity.

CHRSLSC will only ever collect your health information from you directly (or if you are under 15 years of age, from your parent or legal guardian) and with your (or your parent or guardian's) express consent. CHRSLSC recognises that health information is sensitive information and will only handle your health information in accordance with CHRSLSC's policies, the Privacy Act and the *Health Records an Information Privacy Act 2002* (NSW).

Is there surveillance at CHRSLSC?

All venues operated by CHRSLSC are subject to video surveillance for security reasons, including to monitor the safety of members, guests and employees and to protect CHRSLSC's assets.

The footage may be used in disciplinary proceedings and/or to investigate incidents and may be disclosed to our legal representatives, our insurers and/or law enforcements agencies.

How do we hold and protect your personal information?

Personal information that is held by us is stored electronically.

We take reasonable steps to ensure that your personal information is safe and secure from unauthorised access, use or disclosure.

Information that we store electronically is held in secure and password protected databases.

Your personal information is securely destroyed when it is no longer needed or when it is out of date.

What happens if my personal information is involved in a data breach?

CHRSLSC has various security measures in place to protect your personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure.

In the event that CHRSLSC's security measures are compromised and your information is the subject of a data breach, CHRSLSC will comply with its obligations for responding to data breaches outlined in the Privacy Act.

Upon becoming aware of a data breach, CHRSLSC will take urgent steps to contain the breach, mitigate any risk of harm and determine who may have been affected by the breach.

CHRSLSC will then assess the breach, including any potential for harm, and determine whether the breach is likely to result in serious harm to any person whose data was involved.

If CHRSLSC has reasonable grounds to believe that the breach is likely to result in serious harm to you, CHRSLSC will notify you of the breach as soon as possible. CHRSLSC will also notify the Office of the Australian Information Commissioner of the breach.

Following a breach, CHRSLSC will conduct a review of its security measures and implement any additional measures it considers necessary to enhance the security of your information.

Are we likely to disclose personal information overseas?

It is unlikely that we will disclose your personal information overseas. However, if you agree to information being put on our websites or social media pages then this could be accessed by other countries.

Our primary servers are stored locally at Google cloud and Microsoft OneDrive.

CHRSLSC will always require that any third party software and storage providers who are based overseas comply with the Privacy Act when dealing with your personal information.

Using CHRSLSC's websites and social media pages

The websites and social media pages operated by or in connection with us may collect personal information for the purposes outlined in this policy.

Any information collected by us as a result of your use of those websites and pages will be handled in accordance with this policy.

Those websites and pages may also use cookies and contain hyperlinks to other websites and pages, including those operated by third parties.

Any hyperlinks are provided for reference only. We do not have control over websites and pages operated by third parties and are not responsible for the content available on such websites or pages or the privacy practices of those third parties.

What does this policy mean?

By entering, visiting or dealing with CHRSLSC, you consent to the terms of this policy.

CHRSLSC will also seek your express consent for the collection, use or disclosure of your personal information for purposes set out in this policy wherever reasonably practicable.

From time to time, your additional consent will be sought for the collection, use or disclosure of your personal information for purposes other than as set out in this policy.

If you do not agree to this policy or do not wish to receive direct marketing information from or in connection with CHRSLSC, please contact our Privacy Officer.

How do I access, update or correct the personal information held by CHRSLSC about me?

You have a general right to access any personal information which we hold about you. You can request access to the personal information we hold about you by contacting our Privacy Officer.

When you request access, we may need further information from you to verify your identity.

If you believe any of the personal information that we hold about you is incorrect or out-of-date, you can ask us to correct it and we will take reasonable steps to ensure that it is accurate, up-to-date, relevant and not misleading.

How do I make a complaint about privacy to CHRSLSC?

If you believe we have breached the Privacy Act or any of the *Australian Privacy Principles*, or if you have any issues about CHRSLSC's collection, use, disclosure or storage of your personal information, please contact our Privacy Officer.

We will respond to you within a reasonable timeframe (usually not more than 30 days).

If you are unhappy with how we handle your issue or complaint, you are entitled to make a privacy complaint to the Office of the Australian Information Commissioner.

How do I contact the Privacy Officer at CHRSLSC?

Privacy Officer is usually the club handicapper, president or captain.

How do I contact the Office of the Australian Information Commissioner?

Please visit the Office of the Australian Information Commissioner's website for contact details: <https://www.oaic.gov.au/>.