

## PRIVACY POLICY

### 1. Purpose

West Pennant Hills Sports Club (WPHSC) is committed to providing exceptional customer service. WPHSC recognises that protecting individual's privacy and making them aware of this privacy policy is part of this commitment.

WPHSC provides a premium hospitality and entertainment venue to its members and guests. This policy sets out the approach which WPHSC takes in relation to the treatment of Personal Information.

This policy includes information on how WPHSC collects, uses, discloses and keeps secure, individuals' personal information. It also sets out how WPHSC makes the personal information it holds available for access to and correction by the relevant individual.

### 2. How WPHSC collects and stores personal information

WPHSC only collects and stores personal information where it is necessary to do so in order to perform one or more of its functions or activities, and in accordance with this Privacy Policy.

The types of personal information collected by WPHSC include member names, date of birth, occupation, addresses and photographs.

WPHSC collects information from individuals by various means including, without limitation, by individuals completing membership application or renewal forms, mailing subscriptions, entry into competitions and promotions, and via access to our website.

WPHSC also scans drivers' licences belonging to guests and WPHSC and operates CCTV cameras throughout each of our facilities.

It is necessary for WPHSC to collect personal information primarily so as to ensure that individuals are supplied with tailored information

about WPHSC products or services. WPHSC also collects and uses personal information for the secondary purpose of:

- provision of products and services;
- accounting purposes; and
- business planning as well as product and service development.

WPHSC is also required to collect and store certain member information in accordance with the Registered and Licensed Clubs Act 1976 (NSW). WPHSC will be unable to allow individuals to join the club or to be a temporary member, unless they have provided the required personal information.

### 3. Use of personal information

WPHSC uses personal information primarily for the purposes listed above.

Where WPHSC utilises direct marketing to individuals it will ensure that individuals are clearly notified of their right to opt out from further direct marketing.

WPHSC will not use personal information without taking reasonable steps to ensure that the information is accurate, complete and up to date.

### 4. Disclosure of personal information

From time to time, WPHSC may disclose personal information to related or unrelated third parties.

WPHSC may disclose personal information to unrelated third parties to enable outsourcing of functions where that disclose or use is for a related secondary purpose and has been notified to individuals or where such disclose is within the individual's reasonable expectations.

WPHSC will take reasonable steps to ensure that its contracts with third parties include requirements for third parties to comply with the use and disclose requirements of the Privacy Act 1988.

In the rare event that WPHSC is required to

## PRIVACY POLICY con't

disclose personal information to law enforcement agencies, government agencies or external advisors, WPHSC will only do so in accordance with the Privacy Act or any other relevant Australian legislation.

### **5. Information Quality**

WPHSC reviews, on a regular and ongoing basis, its collection and storage practices to ascertain how improvements to accuracy can be achieved.

WPHSC will take steps to de-identify or destroy personal information that is no longer needed for a primary or secondary purpose after a maximum of seven years, unless the law requires otherwise.

### **6. Security of personal information**

Access to personal information in both electronic or hard copy form is provided to a limited number of WPHSC staff whose roles require access to such information.

WPHSC will review, on a regular and ongoing basis, its information security practices to ascertain how compliance with its ongoing responsibilities are maintained.

### **7. Access and correction of personal information held by WPHSC**

WPHSC will allow its records containing personal information to be accessed by the individual concerned in accordance with the Privacy Act.

WPHSC will correct its records containing personal information as soon as practically possible, at the request of the individual concerned, in accordance with the Privacy Act.

Individuals wishing to lodge a request to access and/or correct their personal information should do so by contacting a member of the Administration. WPHSC will not charge any fee for accessing or processing such a request.

### **8. Transferring personal information overseas**

WPHSC generally does not send personal information overseas.

However, from time to time, WPHSC may send your information overseas to service providers or other third parties who operate or hold data outside Australia. Where this occurs, WPHSC will make sure that appropriate data handling and security arrangements are in place. Please note that Australian law may not operate to some of these entities.

### **9. Complaints**

Contact with WPHSC Administration team via phone or web inquiry will be the first point of contact for inquiries about privacy issues.

Any formal privacy related complaints should be directed in writing to the WPHSC's Administration. Such correspondence will be responded to within 7 business days.

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In relation to any of the above house policy the contact details for West Pennant Hills Sports Club (WPHSC) are as follows:

103 – 109 New Line Road, Cherrybrook NSW 2126

Ph: 02 99808500

Fax: 02 99808522

Email:

[memberservices@wphsportsclub.com.au](mailto:memberservices@wphsportsclub.com.au)

WPHSC will endeavour to manage any issues raised efficiently and in a timely manner.

**Brendon Sacilotto**

**Chief Executive Officer**