



Leongatha Golf Club Privacy Policy

This document sets out the policy of Leongatha Golf Club (**LGC**) with respect to the way we collect, protect, use and disclose Personal Information and the choices you can make about your Personal Information in accordance with the Privacy Act 1988 (Cth) (**Act**).

What is Personal Information?

We are committed to providing a high level of privacy in relation to all Personal Information that is collected by us. For the purposes of this policy, 'Personal Information' has the same meaning as set out in the Act and is information from which your identity is either clear, or can reasonably be ascertained.

What information do we collect?

Due to the services provided by LGC, we may collect and hold the following types of Personal Information:

- name;
- mailing or street address;
- email address;
- date of birth;
- telephone number;
- facsimile number;
- profession, occupation or job title and the name of your employer;
- current golf handicap;
- details of membership with other Clubs;
- information, such as point of sale purchase history, collected as a result of a membership card being placed in a club machine that is linked to a player tracking system;
- details of the payments you made, together with any additional information necessary to deliver our services and to respond to your enquiries;
- any additional information relating to you that you provide to us directly through our website or indirectly through use of our website or online presence, through our representatives or otherwise.

We may also collect information that is not Personal Information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how persons use our facilities, services and/or website.

How do we collect Personal Information?

Generally, we collect your Personal Information directly from you unless it is unreasonable or impracticable to do so. We may collect Personal Information from you when you:

- complete a membership application form;
- complete the golf handicap information;

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- complete the visitors register;
- access our website;
- call us or come into LGC and make enquiries.

There may be some instances where we collect your Personal Information through the use of cookies. A cookie is a packet of information stored on your computer that allows our server to identify and interact more effectively with your computer. It also enables us to keep track of information you view so that, if you consent, we can send you news about those products and services. If you do not wish to receive any cookies you may set your browser to refuse them. However, your use of our website may be affected.

For what purposes do we collect, hold, use and disclose Personal Information?

We collect Personal Information about you to the extent necessary to provide you with member or guest services, to conduct events and functions or to carry out our internal administrative operations.

If you do not provide us with Personal Information, we may not be able to provide services or information you request, either to the same standard or at all.

Your Personal Information may be collected, held, used and disclosed by LGC for the following purposes:

- to process membership applications;
- to administer and manage LGC services and functions;
- to conduct business processing functions;
- to provide members via Golfink with access to the National Golfing Handicapping System;
- for the administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes of LGC, its related contractors, partners or service providers;
- to update our records and keep your contact details up to date;
- to provide information and to send communications requested by you, including publishing and providing members with a Club Handbook that includes all member's contact details, Annual Report, and newsletters as part of our member services;
- to answer enquiries and provide information or advice;
- to process and respond to any complaint made by you; and
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority.

When we use your Personal Information, we do so for purposes consistent with the reason you provided it, or for a directly related purpose.

We may disclose Personal Information where permitted, or required, by law or where you have provided us with your express or implied consent to do so. We may also disclose Personal Information to relevant authorities if LGC reasonably believes there is a threat to an individual's life, health or safety, or where LGC has reason to suspect that unlawful activities have been, or may be, engaged in.

We will not actively disclose your Personal Information outside Australia, unless such disclosure is required in order to deliver the services that you have requested and you have provided consent (either express or implied).

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Direct marketing

From time to time we may use your Personal Information to send you direct marketing communications and information about our events and services that may be of interest to you. These communications may be sent to you in various forms, including mail or email. You may opt-out of receiving such communications at any time by instructing our Contact Officer via the process set out under 'How to contact us'.

To whom may we disclose your Personal Information?

We may disclose your Personal Information to:

- our employees, contractors or service providers for the purposes of providing you with member or guest services, to conduct events and functions or to carry out our internal administrative operations;
- members, in regard to member contact details that are published in the Club Handbook, noting that a member may request the non-disclosure of their contact details and in such cases the information will not be published;
- suppliers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes; and
- any organisation for any authorised purpose with your express consent.

When we provide Personal Information to third parties who perform services for us, we take reasonable steps to require those parties to protect your Personal Information as diligently as we do. Strict contractual measures exist between LGC and Golf Australian to ensure your Personal Information is protected.

How do we store and secure Personal Information?

When handling your Personal Information, we take our responsibilities of protecting your privacy very seriously. Your information may be held by us in both electronic and hard copy form. Where such Personal Information is no longer needed it is either de-identified or destroyed.

LGC takes reasonable steps to ensure your Personal Information is protected from unauthorised disclosure, loss, misuse or alteration. However, please note that our website does not provide systems for secure transmission of Personal Information across the internet, except where otherwise indicated. You should be aware that there are inherent risks in transmitting Personal Information via the internet and we cannot provide any guarantee with respect to the security of your Personal Information provided via our website due to the website being linked to the Internet.

How can you access your Personal Information?

You have the right to request access to the Personal Information we hold about you. We will, upon your request, and subject to applicable privacy laws, provide you with access to your Personal Information that is held by us. We ask that you identify the type/s of Personal Information that you are requesting.

Depending on the nature of your request, we may seek to recover from you our reasonable costs incurred in supplying you with access to this information.

There may be instances where we cannot grant you access to the Personal Information we hold, for example, if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If this happens, we will provide written reasons for such refusal.

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How can you update your Personal Information?

It is important that the Personal Information we hold is up to date.

You must notify us as soon as reasonably practicable of any changes to your Personal Information provided to us by you, or when you become aware of any inaccurate, out of date, misleading or false Personal Information about you.

We will take reasonable steps to ensure that the Personal Information we hold about you remains accurate, up-to-date, complete and relevant and, where appropriate, amend our records accordingly.

How to contact us

Should you have any questions about this policy, inquiries regarding privacy and your Personal Information, wish to raise any concerns or make a complaint regarding your privacy and any possible breach of your privacy, please contact us using via the details below:

Telephone – (03) 5664 3314

Email – admin@leongathagolf.com.au

We will address your request or complaint within a reasonable period following our receipt of same. We aim to ensure that such matters are addressed and resolved in a timely and appropriate manner.

After assessing your complaint, we will decide what action (if any) we should take in response.

If we have not resolved a complaint to your satisfaction, you may wish to escalate the matter to the Privacy Commissioner via an online privacy complaint form which can be found at:
<http://www.oaic.gov.au/privacy/making-a-privacy-complaint>.

Changes to our privacy policy

LGC will post changes to this policy on our website and publish the effective date when the policy was updated. We encourage you to review this policy from time to time so that you remain informed as to how we are protecting your Personal Information.

Last updated: 15 October 2019
