



PRIVACY POLICY

Toronto District Workers Club and Toronto Country Club (The Club) respects your right to privacy and is committed to protecting your personal information.

This Privacy Policy outlines how we manage your personal information. Our policy follows the principles set out by the Office of the Australian Information Commissioner. From 12 March 2014 the Australia Privacy Principles (APPs) replaced the National Privacy Principles.

The Club will be open and transparent about how and why we collect information and how we might use the information. In some cases, if you do not want us to collect or use your information in a particular way, then you will be given an opportunity to say so.

This Privacy Policy is to inform you of:

- How and when the Club collects personal information;
- How the Club uses and discloses personal information;
- How the Club keeps personal information secure, accurate and up to date;
- How an individual can access and correct their personal information; and
- How the Club will facilitate or resolve a privacy complaint.

PERSONAL INFORMATION

The Privacy Act 1988 (Cth) defines 'personal information' to mean information or an opinion, whether true or not and whether recorded in a material form or not, about an individual whose identity is reasonably identifiable, from information or opinion.

The kind of personal information that we collect is:

- Your contact information such as full name (first and last), e-mail address, current postal address, delivery address (if different to postal address) and phone numbers;
- Details relating to your employment (if applicable) or your previous employment;
- Your date of birth;
- Proof of your date of birth (including, but not limited to, driver's licence, passport, birth certificate);
- If you work for the Club as an employee or are associated with the Club as a supplier or contractor, we will naturally have some details on you or your organisation;
- When a membership card is used in a gaming machine, swipe machine or at any of our restaurants, bars or point of sale outlets, the information is used to award 'Membership Rewards' and is cross referenced with our membership database. This information in a consolidated manner, is used to help make decisions on changing or improving our service offerings.



HOW WE USE YOUR INFORMATION

The Club may collect information from you in a number of ways. These include, but are not limited to:

- When you apply for membership;
- Request to receive products or services;
- Purchasing food, beverage or other products;
- Using credit card or EFTPOS for purchases;
- Event ticket purchases;
- Entering a competition or voting forum;
- Membership loyalty program;
- When you utilise the Club's services with your membership card;
- When you complete a survey or questionnaire;
- Using the Clubsafe Self Exclusion Agreement.
- When you engage in certain activities such as entering a contest or promotion, filling out a survey, filling out a form or sending us feedback, we may ask you to provide certain information. It is completely optional for you to engage in these activities.

USE & DISCLOSURE OF PERSONAL INFORMATION

The Club collects this information in order to:

- Identify you and process your membership application;
- Meet statutory requirements under the Registered Clubs Act, Anti-money Laundering and Counter Terrorism laws and other relevant legislation;
- Contact members to advertise and market events, activities, opportunities, offers and the goods and services provided by the Club (including by direct mail, telephone, SMS and MMS); and including without limitation with respect to food and beverage, promotions, entertainment, wagering, gaming machines, gaming, sporting events and venue hire;
- Analyse usage of food and services offered by the Club;
- Provide you with goods or services you are receiving or utilising as offered by the Club and to offer and administer any benefits you subsequently become entitled to in relation to that product or service;
- Analyse website usage;

We will only send personal information about you to other organisations when;

- We have your consent to share the information;
- We are required or authorised by law to disclose this information. Such information remains under the Club's control at all times and the employees and other persons who may have access to your information are bound by specific confidentiality and non-disclosure agreements.

Guests: Under the Registered Clubs Act patrons visiting the Club must produce a recognised form of identification, i.e. passport, drivers licence or proof of age card to gain entry to the premises. The Club uses terminals to gather this information and to protect the data collected, i.e. addresses of patrons.



Scanning of licenses is optional and, if preferred, use of manual sign-in via the terminal is available for patrons once the form of identification has been sighted by an authorised officer of the Club.

Surveillance of Venues: The Club uses video surveillance for security reasons. Details of suspected or actual illegal and/or undesirable activities on our premises may be shared with other clubs, law enforcement and regulatory bodies such as the Office of Liquor, Gaming and Racing and the Independent Liquor and Gaming Authority.

HOLDING & STORING PERSONAL INFORMATION

The Club is committed to keeping your personal information secure and we will take all reasonable precautions to protect your personal information from unauthorised access, loss, release, misuse or alteration.

All information may be stored in hard copy documents, but is generally stored electronically on the Club's software or systems. Hard copy personal information is stored and archived for a period of seven (7) years.

The Club maintains physical security over its paper and electronic data stores, such as locks and security systems. The Club also uses computer and network security technologies such as firewalls, intrusion prevention software, antivirus software, e-mail filtering and passwords to control and restrict access to authorised staff for approved purposes and to secure personal information from unauthorised access, modification, disclosure, misuse and loss.

The Club will destroy or permanently de-identify personal information if it is no longer needed for the purpose for which it was collected.

Whilst the Club takes all reasonable steps to secure your personal information from loss, misuse and unauthorised access, you acknowledge that all activities in which you intentionally or unintentionally supply information to the Club carries an inherent risk of loss of, misuse of, or unauthorised access to such information.

INFORMATION SECURITY

We protect personal information through the use of secure databases that can only be accessed by authorised individuals. As a matter of course, employees, including those able to access personal information, are bound by the confidentiality clause in their employment contract as well as the confidentiality policy in the staff handbook.

DISCLOSURE

In general, personal information is used for the purpose of facilitating the sale, management and enjoyment of our products and services. We also use personal information for the management of our business relationships. For example, your information may be used so we can contact you about:



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- Marketing, updates and promotional activities by us and our related bodies (including by direct marketing messages) such as our customer loyalty programs;
 - To offer you updates or other content or products and services that may be of interest to you;
 - If you do not wish to receive these offers, you can notify us at any time and we will not send such offers to you in the future.

The Club may also disclose personal information to third parties with whom we contract for the supply or performance of certain products and services in relation to the operation of the Club and with third parties with whom we have a commercial relationship. This may include, but is not limited to:

- Product suppliers who may require the information for fulfilment purposes;
- Mail and e-mail handling services;
- Market research agencies for conducting research on our behalf;
- To provide technical support for our database or services;
- Anti-money laundering incidents;
- If a patron enters into a ClubSafe Self Exclusion Agreement;
- If the information is required by law;
- In these situations the third party contractor is prohibited from using personal information about you except for the purpose for which it was supplied.

Information That You May Disclose Publicly: When you post information on social media platforms associated with the Club and its venue, it is to be understood that this information is in the public domain and the Club is not a position to accept any responsibility for whom or why anyone might access the information.

OPT-OUT

If, for any reason, you would like to be removed from our mailing lists, please complete one of the following:

- Contact our Club Receptionist by phoning (02) 49592011 or visiting the Club;
- Select 'I do not wish to receive information from the Club about its offers and promotions' on your Membership application or renewal form;
- Select 'Unsubscribe' on electronic communications;
- Use the 'opt-out' link provided in any SMS campaigns.

ACCESSING YOUR OWN INFORMATION

Should you have a need to access your personal information that is held by the Club, you will be required to address a request to the Privacy Officer in writing and this will be managed in accordance with appropriate legislation.

The Club encourages its members to update or correct personal information so that the information is accurate and up to date. This can be done at Club Reception.



SECURITY & COMPLAINTS

Toronto District Workers Club and Toronto Country Club is committed to ensuring the security of your personal information and we will take all reasonable precautions to protect this information from loss, misuse or alteration. Should you wish to lodge a complaint regarding the possible breach of the Australia Privacy Principles please contact the Privacy Officer in writing. On receipt of your complaint a review will be conducted and findings will be communicated to you.

ANONYMITY & ONLINE ISSUES

Where lawful and practicable, individuals may transact with the Club without providing personal information. However, as a Registered Club, we are required to collect basic personal information that covers data such as name, date of birth, address and contact details.

When you visit the Club website our internet service provider makes a record of the visits and logs the following information for statistical purposes - the user's server address, the user's top-level domain name (eg: .com, .gov, .au, etc), the date and time of visit to the site, the pages accessed and documents downloaded, the previous site visited and the type of browser used. No attempt will be made by the Club to identify users or their browsing activities.

We may use 'cookies' to enhance the functionality of the website; however, cookies are not used to record any personal information (eg: name, address, e-mail address).

We may collect personal information if you send us a message or submit a request for further information regarding one of our products or services.

CHANGES TO THIS STATEMENT

The Club may make changes to this Privacy Policy from time to time for any reason. We will publish those changes on our website, www.torontoworkers.com.au and www.torontocc.com.au

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