



**EastS**

**EastS Leagues Club**  
**Operations**  
**Management System**

Privacy Policy  
August 2021

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## 1. Policy Statement

The Information Privacy Act 2009 (Qld) sets out 13 Australian Privacy Principles (APPs) which regulate how Easts Leagues Club collects, stores, provides access to, uses and discloses personal information. The Act enforces the APPs with a statutory based complaints scheme which can include the award of compensation for privacy breaches in certain circumstances.

Easts Leagues Club is committed to the objectives of the Information Privacy Act 2009. This policy is based on the following principles:

1. The club supports responsible and transparent handling of personal information;
2. The club respects an individual's right to know how their personal information will be collected, used, disclosed, stored and disposed of; and
3. Adequate privacy protection is a necessary condition for the club and its associated entities to participate in e-communications and e-transactions.

Personal information will be collected, stored, used and disclosed in accordance with the procedures.

## 2. Introduction

Easts Leagues Club is committed to safeguarding staff, member's and patron privacy and ensuring the confidentiality and security of any personal information we may collect is maintained in a manner that ensures its security.

To comply with legal requirements and to ensure operational needs can be discharged effectively, it is necessary for us to collect certain personal information from staff, club members and other individuals and organisations we associate with.

At the minimum, this may include information such as names, addresses and contact details. Additional information may be required, depending on the nature of your relationship with Easts Leagues Club.

Other personal and or confidential information we may hold can include play and spend patterns for customers, marketing strategies, terms of employment and the like that employees of the club may have access to. It is imperative that all such information is maintained as confidential by all parties associated with Easts Leagues Club.

We will only use or disclose your personal information for the primary purpose it was collected, unless you have consented to the information being used for a secondary purpose.

The Club takes all reasonable measures to protect personal information from loss, unauthorised access, destruction, misuse, modification or disclosure.

If the unauthorised use of personal information is identified, Easts Leagues Club will take all practicable steps to ensure that the breach is notified to the individuals in question, including actions taken to contain the breach. The breach shall also be reported to relevant entities and or authorities such as the Office of the Information Commissioner, as prescribed by the Australian Privacy Principles. Please see Section 13 for further information on notification requirements.

## 3. Scope

The Privacy Policy applies to personal information collected by Easts Leagues Club. The club is an applicable organisation under the *Privacy Act 1988* (Cth). This act governs the way our entities collect, use, keep secure and disclose personal information.

This Policy outlines how the club will comply with the Australian Privacy Principles (APP's), including:

- Information we collect;
- How and when we collect personal information;
- How we use and disclose personal information;
- How we keep personal information secure, accurate and up-to-date;
- How an individual can access and correct their personal information;
- Other confidential information we may hold or have access to;
- Changes to the Privacy Policy;
- How to contact us; and
- How we will facilitate or resolve a privacy complaint.

We recommend that you read and understand the Privacy Policy and keep it for future reference. The Policy is subject to change and East's Leagues Club encourages its members and guests to review the Policy periodically. If you require any clarification, you can contact us on the address at the end of the document.

## 4. Amendment Register

Version	Amendment	Date (dd/mm/yy)	Completed By	Authorised by
1	Review of old policy. Addition of Digital information provisions Review of legislative requirements Update to ID Scanning and Digital ID Provisions	June 2019	Sharna McLean, and Daniel Brimelow	Sharna McLean
2	Review of Policy and addition of Confidentiality Clauses	August 2021	Daniel Manning and Daniel Brimelow	Jan Broodryk

## 5. General

### 1. Personal information

#### What is Personal Information?

- (a) Personal information is defined under the *Privacy Act 1988* 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 the information or opinion*”.
- (b) Some examples of personal information are your name, residential address, email address, bank details, photos and opinions on your likes and dislikes that can identify you.

### 2. Sensitive Information

#### What is Sensitive Information?

- (a) Sensitive information is a subset of personal information.
- (b) It means “*information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political organisation, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership*”.

*of a trade union, sexual orientation or practices, criminal record, health information about an individual, genetic information, biometric information that is to be used for the purpose of automated biometric verification or biometric identification or biometric templates”.*

### **Collection of Sensitive Information**

- (a) In general, we attempt to limit the collection of sensitive information we may collect from staff and patrons, this largely depends on the use you make of our products or our relationship with you, this may not always be possible and we may collect sensitive information from you in order to carry out services provided to you or in the facilitation of an employment agreement.
- (b) The type of sensitive information we may collect from you or record about you is dependent on your relationship with the club (i.e. patron, member or employee) and will be limited to the purpose(s) for which it is collected.
- (c) We do not use sensitive information to send you Direct Marketing Communications (as defined in Section 9 of this Policy) without your consent.
- (d) We will not collect sensitive information from you without your consent.

### **Consent to collection of certain types of sensitive information**

We may collect certain types of sensitive information where you have consented and agreed to the collection of such information.

We will obtain your consent at (or around) the point in time in which we collect the information. The main type of sensitive information that we may collect (if any) will usually relate to your:

- (a) criminal record (if any);
- (b) special food or dietary requirements due to medical, cultural or religious reasons;
- (c) biometric identification, such as fingerprint scans;
- (d) membership of political organisations and political opinions;
- (e) racial origin and religious beliefs, to the extent these are ascertainable from any photographic identification (such as a driver's licence or passport);
- (f) gambling habits;
- (g) philosophical beliefs, if applicable; and
- (h) in certain cases, health or medical information,

Sensitive information will only be collected as required and only on the provision that the individual has agreed to that information being collected.

## **3. Confidential Information and Confidentiality**

### **What is Confidential Information?**

Confidential Information means all information which is confidential to the Employer, including:

- Trade secrets;
- Information concerning the market in which the Employer operates;

- Technical information concerning the Employer's products or the financial performance;
- Business projections, business plans and business forecasts concerning the Employer's performance or likely future activity; and
- Any other information which is confidential to the business affairs of the Employer or its **suppliers and customers** which is not in the public domain.

**With regard to Confidential Information all employees agree to abide by the following:**

- Keep the terms of any issued Letter of Appointment confidential.
- During your employment and following termination of your employment, you will keep confidential all Confidential Information provided to you or gathered by you through observation.

Without limiting this clause, you agree that you will:

- Use Confidential Information solely for the purpose of performing your duties for Easts Leagues Club.
- Only disclose Confidential Information to persons who have either:
  - Been approved by Easts to be informed of the Confidential Information by you, and/or
  - Are an employee of Easts and are aware and agree that the Confidential Information must be kept confidential and has a need to know the Confidential Information.
- You will immediately notify Senior Management of any suspected or actual unauthorised use, copying or disclosure of Confidential Information.
- Upon termination of your employment with Easts, you will return all Employer documents that contain Confidential Information.

## 4. Intellectual Property

**What is Intellectual Property?**

- All present and future rights in relation to patents, copyright, designs, trade secrets, trademarks, inventions, technical know-how, confidential information and commercially sensitive information; and
- Any application or right to apply for registration in respect of the above.

All Intellectual Property created or otherwise generated by you during the course of or in connection with your employment with Easts will be owned by Easts Leagues Club. You consent to assign to Easts all existing and future intellectual property rights.

You hereby waive any moral rights and voluntarily and unconditionally consent to all or any acts or omissions by Easts Leagues Club, or persons authorised by the Club, which would otherwise infringe your moral rights.

- In this clause, Moral Rights means any moral rights as defined in the Copyright Act 1968 (Cth).

## 5. Collection of your personal information

We will only collect personal information that is necessary for us to either provide employment or to provide our products and services to you. This depends ultimately upon the purpose of collection and we have set out the general purposes of collection below.

The type of information includes (but is not limited to) the following:

- (a) **For suppliers or goods and services providers**, contact information such as company name, ABN/CRN, bank account details, business address, email, website, phone numbers etc;
- (b) **For members**, 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, as well as that listed below;
  - (1) details required as part of your club membership or visitation, including but not limited to the information required under the members and visitor's registers;
  - (2) whether you participated in any activity or event organised by the club;
  - (3) use of POS (point of sale terminals) to purchase goods;
  - (4) entry and activity on the club's website, including;
    - (A) The user's server address;
    - (B) The user's domain name (e.g. .com, .gov, .net, .au etc.)
    - (C) The date and time of the visit and the pages accessed or downloaded.

**Note: No attempt will be made to identify users or their browsing activity except, in the unlikely event of an investigation, where a law enforcement agency may exercise a warrant to inspect the ISP's logs.**

- (5) photographs or video footage taken at our premises, which may include you;
  - (6) details of any enquiries or complaints made by you;
  - (7) your opinions, statements and endorsements collected personally or via surveys and questionnaires, including but not limited to your views on the products and services offered by the club; and
  - (8) if you are requesting products or services from us or we are purchasing goods or services from you, then any relevant payment or billing information (including but not limited to bank account details, direct debit, credit card details, billing address, repayment information and invoice details).
- (c) **For members and visitors, ID is gathered, ID for all persons entering the club may be scanned using our InfoSign Terminals. These records are maintained as confidential and may only be accessed by senior management and authorised government representatives.**
  - (d) **For employees and appointees of the club** only - details relating to your employment (if applicable) or your previous employment, which shall include, but is not limited to, obtaining your tax file number, bank account and superannuation details, as well as that listed below;
    - (1) your date of birth;



- (2) your social media details;
- (3) proof of your identity (including, but not limited to, driver's licence, passport, birth certificate);
- (4) Right to work in Australia information;
- (5) any sensitive personal information listed in section 2;
- (6) if applicable, emergency contact details;

As far as possible or unless provided otherwise under this privacy policy, we will collect your personal information directly from you.

In the event we collect details about you from someone else, we will, whenever reasonably possible, make you aware that we have done this and the reason for it.

Staff members and other appointees are strictly prohibited from providing personal details of other staff members including but not limited to, contact details, hours of work or any other information deemed sensitive under this policy.

If we receive personal information about or relating to you, but not from you and we determine that such information could have been collected lawfully, then we will treat it in the same way as solicited personal information and in accordance with the APPs.

If we determine that such information could not have been collected in the same manner as personal information provided by you, and that information is not contained in a Commonwealth record, we will, if it is lawful and reasonable to do so, destroy the information or de-identify the information.

When you engage in certain activities, such as entering a contest or promotion, filling out a survey or sending us feedback, we may ask you to provide certain information, which you may withhold or provide at your own discretion. It is optional for you to engage in these activities.

Depending upon the reason for requiring the information, some of the information we ask you to provide may be identified as **mandatory** or **voluntary**. If you do not provide the mandatory data or any other information, we require in order for us to provide our services or offer of employment to you, we may be unable to provide or effectively provide our services or offer of employment to you.

If you use our website, we may utilise "cookies" which enable us to monitor traffic patterns and to serve you more efficiently if you revisit our website. A cookie does not identify you personally but may identify your internet service provider or computer. You can set your browser to notify you when you receive a cookie, and this will provide you with an opportunity to either accept or reject it in each instance.

## 6. Anonymity and Pseudonymity

If you wish to do so, when making enquiries or dealing with the club you may elect not to identify yourself or use a pseudonym. This may be particularly prevalent where individuals wish to participate in a blog or enquire about a particular campaign.

Your decision to interact anonymously or by using a pseudonym may affect the level of services we can offer you. In most cases, it may be impracticable to deal with or disclose information to individuals who fail to disclose their identity.

In certain matters, the club may be required or authorised to deal with only those individuals who have identified themselves. In cases where failing to disclose your identity will affect the



level of service, we can offer you, we will inform you of such and advise you of any additional options which may be available to you.

Notwithstanding the above clauses, various liquor and gaming laws require that an individual must identify themselves on each occasion they enter the club's facilities. Patrons who also wish to become members must identify themselves and will be required to do so, each time they are requested to whilst attending the premises.

## 7. Identifiers

Each member can be identified by inputting the individual details, (last name, member number etc) into the Clubs data base.

Employees can be identified by Employee Number.

Identifiers for other individuals or organisations who provide information to the club, are ascertained by account numbers, supplier codes or other distinguishing information provided.

The club does not adopt any government related identifiers as its own.

All government related identifiers (Medicare card, tax file, ABN numbers etc), applied to an individual or an organisation are only used by the club for their prescribed circumstances, as required by Government bodies or agencies.

The club will take all steps necessary to ensure that the government related identifiers are not disclosed to any other individuals or organisations other than those listed above.

## 8. Use and disclosure of your personal information

We will only use or disclose your personal information for the primary purposes for which it was collected or as consented to and/or as set out below.

You consent to us using and disclosing your personal information to facilitate a purpose in connection with:

- (a) If required, the verification of your identity, including the verification of your date of birth, if applicable;
- (b) Facilitating membership or visitation requirements (for example, entry into the register of members which is available for public inspection by other members);
- (c) Provision of our products and services to you, which shall include but is not limited to:
  - (1) The administration and management of our products and services, including charging, billing, credit card authorisation and verification, checks for financial standing, credit-worthiness (including but not limited to undertaking an assessment for credit loss and obtaining credit references, if applicable), fraud and collecting debts; and
  - (2) To offer you updates, or other content or products and services that may be of interest to you;
- (d) To facilitate the administration, management and improvement of the club, including but not limited to:
  - (1) The use of your personal information collected in accordance with section 3 of this policy document and in the administration and management of the club;

- (2) Communications between member clubs (being those clubs which are members of Clubs Queensland), including but not limited to reciprocal arrangements and sharing of industry news;
- (3) The management, governance and administration of the club, including but not limited to any management and governance meetings of the club;
- (e) If applicable, any requirement to include you in various registers maintained by the club including, but not limited to, the register of excluded persons;
- (f) Facilitating medical assistance in the event of a medical emergency;
- (g) Your participation in any activity or event organised by the club or a third-party organisation;
- (h) Your ability to attend other member clubs in Australia or New Zealand;
- (i) Co-ordinating, managing and maintaining good order and security of the club and our premises, which shall include but is not limited to protecting the rights and safety of other parties on our premises;
- (j) Investigating and reporting information to relevant third parties such as police, WHS QLD, AUSTRAC or other authorised entity regarding any accidents or incidents that may have occurred on our premises;
- (k) The improvement of our services (including to contact you about those improvements and asking you to participate in surveys about our products and services);
- (l) The maintenance and development of our products and services, business systems and infrastructure;
- (m) Marketing and promotional activities by us, our related bodies and relevant marketing companies and other like companies (including by direct mail, telemarketing, email, SMS and mms messages) such as our customer loyalty programs and newsletters;
- (n) To provide customer service functions, including handling customer enquiries and complaints;
- (o) To offer you updates, or other content or products and services that may be of interest to you;
- (p) To comply with applicable laws;
- (q) The transfer, and matters in connection with a potential transfer, of the club to another entity; and
- (r) Any other matters reasonably necessary to continue to provide our products and services to you.

We may also use or disclose your personal information and in doing so we are not required to seek your additional consent:

- (a) When it is disclosed or used for a purpose related to the primary purposes of collection detailed above and you would reasonably expect your personal information to be used or disclosed for such a purpose;
- (b) If we reasonably believe that the use or disclosure is necessary to lessen or prevent a serious or imminent threat to an individual's life, health or safety or to lessen or prevent a threat to public health or safety;

- (c) If we have reason to suspect that unlawful activity has been, or is being, engaged in; or
- (d) If it is required or authorised by law.

In the event we propose to use or disclose such personal information other than for reasons detailed in section 8 above, we will first seek your consent prior to such disclosure or use.

If you have received communications from us and you no longer wish to receive those sorts of communications, you should contact via the details set out at the end of this document and we will ensure the relevant communication ceases.

Any other use or disclosure we make of your personal information will only be as required by law or as permitted by the *Privacy Act 1988* or by this privacy policy or otherwise with your consent.

## 9. The types of organisations to which we may disclose your personal information

We may disclose your personal information to other organisations. Examples of organisations and/or parties that your personal information may be provided to include:

- (a) Other member clubs;
- (b) Clubs Queensland and its related bodies;
- (c) If applicable, Clubs Australia and Club New Zealand, and member clubs of Clubs Australia and Clubs New Zealand;
- (d) Offshore service providers, if any and only if direct permission is sought from the individual in writing;
- (e) Related entities and subsidiaries of the club;
- (f) If relevant and if permission has been granted through a membership application process, Competition Terms and Conditions etc, certain third parties, such as trade suppliers, club sponsors, marketing companies used and like companies; and
- (g) Our contractors and agents, including but not limited to our professional advisors such as accountants, solicitors and auditors or other companies who assist us in providing our products and services to you.

Your personal information is disclosed to these organisations and/or parties only in relation to the goods or services we provide to you or for a purpose permitted by this privacy policy.

We take reasonable steps to ensure that these organisations and/or parties are aware of the provisions of this privacy policy in relation to your personal information (under the Australian Privacy Principles) and are committed to the safeguarding of same.

## 10. Photographs and Closed-Circuit Television

We use closed circuit televisions (CCTV) throughout our premises in all areas and surrounding areas (car park). The CCTV is integral to our security system and CCTV images are stored for a minimum "retention period" of 28 days (unless an incident is identified, in which case the images are retained for a minimum period of one year after the retention period unless they are given to the relevant authority (e.g. police). The CCTV footage must be archived if requested by the relevant authority.

If an incident occurs at the Club, CCTV footage for the period leading up to, during and following the incident must be archived and where no incident has been identified, the CCTV footage is automatically deleted within 30 days after the minimum retention period.

As indicated in Section 5 of this Policy, we may take photographs of you attending our premises, and we may wish to use them for marketing and advertising purposes. Unless you advise us otherwise, you expressly agree and consent to the use of any photographs, which may include you, for the aforementioned purposes, without compensation.

## 11. Direct Marketing

You expressly consent to us using your personal information, including any email address you give to us, to provide you with information and to tell you about our products, services or events or any other direct marketing activity (including third party products, services, and events) (**Direct Marketing Communications**) which we consider may be of interest to you.

Without limiting the application of the above, if it is within your reasonable expectations that we send you Direct Marketing Communications (given the transaction or communication you have had with us), then we may also use your personal information for the purpose of sending you Direct Marketing Communications which we consider may be of interest to you.

You expressly consent to us disclosing your personal information to other organisations (including but not limited to organisations such as those listed in Section 7 of this policy) that may also use your personal information for sending you Direct Marketing Communications.

If at any time, you do not wish to receive any further Direct Marketing Communications from us, or others, you may ask us not to send you any further information about products and services and not to disclose your information to other organisations for that purpose. You may do this at any time by:

- (a) using the “unsubscribe” facility included in the email;
- (b) replying with a text message sent from the club with the word STOP; or
- (c) by contacting us via the details set out at the end of this document.

## 12. Cookies

Internet cookies are small strings of text placed on users' hard drives during the data exchange that happens when a browser points to a website. Cookies allow a website to store information on a user's machine and retrieve it later. Cookies and other information collection technologies can only store information that is explicitly provided by the user or visitor in the first place, or information the website already knows about the user, such as their IP address.

Easts Leagues Club website uses cookies for:

- Identifying unique visitors to the site for statistical purposes (that is, you may be allocated a visitor number which will be held in a cookie on your computer or device for a fixed period, such as 30 days. This cookie will also hold your IP address).

Easts Leagues Club may also use Google Analytics to gather statistics about how its website is accessed. Google Analytics uses cookies to gather information for the purpose of providing statistical reporting. The information generated by the cookie about your use of the website will be transmitted to and stored by Google on servers located outside of Australia. No personally identifying information is recorded or provided to Google.

Easts Leagues Club uses third party marketing platforms, including Google Ads, Facebook, and Twitter to market its products and services.

These marketing platforms may also serve our ads to you on their own websites, or on partner websites and apps. The marketing platforms we use allow us to advertise and communicate to you based on profiles developed according to your use of our websites, personal information you provide to us, and your response to the advertising messages we serve to you.

We may also use third party audience data from Google Analytics, such as age, gender and interests, to provide advertising that's suited to your preferences. No personally identifiable information is recorded or provided to these third parties through this process, however information generated by the cookie about your use of our website may be transmitted to our vendors and may be stored on servers outside of Australia.

Easts Leagues Club contracts third party service providers to market its products and services.

These third-party providers are contracted to protect any personal data with the same level of protection as Easts Leagues Club.

Most browsers can be set to accept or reject cookies. You can choose to adjust your browser to reject cookies or to notify you when they are being used. Sometimes, rejecting cookies results in a loss of some website functionality.

### 13. Cross Border Disclosure

Any personal information that you provide to us may be transferred to, and stored at, a destination outside Australia (usually cloud based storage entities such as Amazon etc), where we may utilise overseas data and website hosting facilities or have entered into contractual arrangements with third party service providers to assist us with providing our goods and services to you. Personal information may also be processed by staff or by other third parties operating outside Australia who work for us or for one of our suppliers, agents, partners or related companies.

By submitting your personal information to us, you expressly agree and consent to the disclosure, transfer, storing or processing of your personal information outside of Australia. In providing this consent, you understand and acknowledge that countries outside Australia do not always have the same privacy protection obligations as Australia in relation to personal information. However, we will take steps to ensure that your information is used by third parties securely and in accordance with the terms of this privacy policy.

The *Privacy Act 1988* requires us to take such steps as are reasonable in the circumstances to ensure that any recipients of your personal information outside of Australia do not breach the privacy principles contained within the *Privacy Act 1988*.

By providing your consent, under the *Privacy Act 1988*, we are not required to take such steps as may be reasonable in the circumstances. However, despite this, we acknowledge the importance of protecting personal information and have taken reasonable steps to ensure that your information is used by third parties securely and in accordance with the terms of this privacy policy.

If you do not agree to the transfer of your personal information outside Australia, please contact us via the details set out in Section 17 of this document.

### 14. Data quality and security

We have taken steps to help ensure your personal information is safe. All practicable measures are taken by the club to ensure information security, however, we cannot guarantee the security of all transmissions or personal information, especially where the Internet is involved.

Notwithstanding the above, we will take reasonable steps to:

- (a) Make sure that the personal information we collect, use or disclose is accurate, complete and up to date;
- (b) Protect your personal information from misuse, loss, unauthorised access, modification or disclosure both physically and through computer security methods; and
- (c) Destroy or permanently de-identify personal information if it is no longer needed for its purpose of collection.

However, the accuracy of personal information depends largely on the information you provide to us, so we recommend that you:

- (a) Let us know if there are any errors in your personal information; and
- (b) Keep us up-to-date with changes to your personal information (such as your name or address).

East's Leagues Club undertakes an annual review of its member's details. Prior to renewing a member's membership, if requested we can provide you with the current details we hold on the system. If there are errors in these details, we urge you to advise the club and we will update them accordingly.

Personal information which is held by the club will be destroyed, when the club receives:

- (a) A request from an individual that their membership be terminated;
- (b) Notification of the death of a member or a person for which the club holds personal information for; or
- (c) Notification that a membership has lapsed and is not renewed within the six-month grace period.

## 15. Notifiable Data Breaches

We have taken steps to help ensure your personal information is safe.

Whilst all practicable security measures are taken it must be stated that we cannot guarantee the security of all transmissions or personal information, especially where the Internet is involved.

If the club suspects that there has been a data breach, we will take immediate steps to contain the extent of the breach and limit any further access to the information.

Once the data breach has been contained, the club will then assess the breach and investigate how the incident occurred within thirty (30) days. Once the club has the relevant information, we will make an evidence-based decision as to whether serious harm is likely.

If it is deemed that serious harm is likely, the club will both notify the individual whose data has been breached and the Office of the Information Commissioner QLD. The notification will include any remedial actions taken by the Club in response to the breach.

### 13.1 Step 1 Alert

Where a privacy data breach is known to have occurred (or is suspected) any member of club staff who becomes aware of this must, within 24 hours, alert a Member of the Senior Management Team in the first instance.

Note: the term 'Senior Management' is the General Manager, the Senior Accounts, the nt General Manager and the HR Manager.

The Information that should be provided (if known) at this point includes:

- a) When the breach occurred (time and date)
- b) Description of the breach (type of personal information involved)
- c) Cause of the breach (if known) otherwise how it was discovered
- d) Which system(s) if any are affected?
- e) Which directorate/faculty/institute is involved?
- f) Whether corrective action has occurred to remedy or ameliorate the breach (or suspected

### 13.2 Step 2 Assess Potential Impact and Severity

Once Senior Management have been notified the following will occur:

#### Determine what data has been accessed:

- Is personal information involved?
- Is the personal information of a sensitive nature?
- Has there been unauthorised access to personal information, or unauthorised disclosure of personal information, or loss of personal information in circumstances where access to the information is likely to occur?
- The type and extent of personal information involved?

What is the severity (consider the following):

- Whether multiple individuals have been affected
- Whether the information is protected by any security measures (password protection or encryption)
- The person or kinds of people who now have access
- Whether there is (or could there be) a real risk of serious harm to the affected individuals
- Whether there could be media or stakeholder attention as a result of the breach or suspect breach

With respect to the above, serious harm could include physical, physiological, emotional, economic/financial or harm to reputation and is defined in section 4 - 2 of the Privacy Policy and section 26WG of the Notifiable Data Breaches Act.

For the purposes of this assessment the following terms are defined in section 4 - 2 of this Privacy Policy.

Where a breach occurs, the Club will review the circumstances surrounding the breach and take action to prevent any further breaches.

### 13.2 Step 3 Actions Required of Senior Management

Ensure that immediate corrective action is taken, if this has not already occurred corrective action may include:

- retrieval or recovery of the personal information.
- ceasing unauthorised access.
- shutting down or isolating the affected system.

The IT company responsible for our online security will also be accessed to provide information on the breach, the extent of the breach and will assist in stopping the breach and retrieving data as required.

Ensure that the breach is documented within 48 hours of receiving instructions that a breach has occurred. The report must contain the following:



- ✓ Description of breach or suspected breach
- ✓ Action taken
- ✓ Outcome of action
- ✓ Processes that have been implemented to prevent a repeat of the situation.
- ✓ Recommendation that no further action is necessary

This report to be lodged with the Office of the Information Commissioner QLD and the affected persons to also be notified as specified above within 30 days of the Breach occurring.

## 16. Storage of personal information

The club holds physical documents and files which contain personal information in restricted access areas. All files are accessible, strictly by approved personnel only.

Electronic personal information is stored on servers that are owned and controlled by the club and cloud storage providers. The servers will be password protected and feature a secured login.

All 'back-up' stores are held off site and maintained by contracted IT Service Providers.

If the club wishes to do so, personal information may also be stored in a secure web-based application on a data server, which is owned and operated by a third party (e.g. cloud sharing services). The club will take reasonable steps to ensure that any third-party providers comply with the APP's.

At such time that the club does not require your personal information (and is not obligated to keep records by law), the club will take all reasonable steps to ensure that the information is de-identified and destroyed. Please see section 12 of this policy document.

## 17. Access to and correction of your personal information

You are entitled to have access to any personal information relating to you which we possess, except in some exceptional circumstances provided by law. You are also entitled to edit and correct such information if the information is inaccurate, out of date, incomplete, irrelevant or misleading.

If you would like access to, or if you would like to correct any records of personal information, we have about you (this includes employee records etc), you are able to access and update that information (subject to the above) by contacting us via the details set out in Section 17 of this document.

Prior to accessing any confidential information, you may be required to produce acceptable photographic or 100 points of identification. Failure to comply with this requirement, may result in your request for information being denied.

## 18. Consent

You are agreeing to the terms of this privacy principle if you visit the club, use our website or by accepting the terms of one of our terms and conditions (relating to a product or service offer) which refer to this privacy policy.

We reserve the right to modify the privacy policy as our business needs require. We will notify you of such changes (whether by direct communication or by posting a notice on our website), after which, your continued use of our products, services or website or your continued dealings with us shall be deemed to be your agreement to the modified terms. If you do not agree to our continued use of your personal information due to the changes in our privacy policy, please contact us via the details set out at the end of this document.

## 19. Resolving Privacy Complaints

We have put in place an effective mechanism and procedure to resolve privacy complaints. All Complaints will be handled by the Assistant General Manager and will be reported to the appointed Board as required. All complaints are dealt with in a reasonably appropriate timeframe so that any decision (if any decision is required to be made) is made as quickly as is practicable.

If you have any concerns or complaints about the manner in which we have collected, used or disclosed and stored your personal information, you can tell us by contacting the Assistant General Manager who acts as our Compliance Manager for the purpose of this document at the following email address.

Jake Henry – [jake@eastisleagues.com.au](mailto:jake@eastisleagues.com.au)

To ensure confidentiality, please clearly mark your correspondence to the attention of the Assistant General Manager.

In order to resolve a complaint, we:

- (d) Will liaise with you to identify and define the nature and cause of the complaint;
- (e) May request that you provide the details of the complaint in writing;
- (f) May request that you provide any and all supporting documentation;
- (g) Will keep you informed of the likely time within which we will respond to your complaint; and
- (h) Will inform you of the legislative basis (if any) of our decision in resolving such complaint.

We will keep a record of the complaint and denote any action taken in a privacy register.

**Date of Effect:** August 2021

**Authorised By:**

**Signature:**

**Date Review Due:** August 2021