



Policy- Privacy

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Author:	BDRSL- General Manager
Responsible Person:	BDRSL- Office Administration Manager
Relevant Legislation/Authority	Privacy Act 1988 (Cth)
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Bendigo District RSL Sub-Branch Inc. (ABN 32 661 050 883) (**Bendigo District RSL, Bendigo RSL, BDRSL, we, us**) is committed to managing personal information in accordance with the Australian Privacy Principles under the *Privacy Act 1988 (Cth)* and in accordance with other applicable privacy laws.

This document sets out our policies for managing personal information of individuals with whom we interact with either at our premises, off-site or remotely (including over the telephone and via our website).

What personal and sensitive information do we collect about you?

Personal information collected by us about an individual will vary depending on the circumstances of collection and is limited to information which is reasonably necessary for our functions or activities. It may include, but is not limited to, an individual's contact details (name, email, postal address, residential address and phone number), date of birth, gender, credit or debit card details, driver's licence number, passport number, insurance details, employment history, qualifications or communication history with us. During recruitment, we may collect additional details such as your tax file number and superannuation information and other information necessary to conduct background checks to determine your suitability for certain positions.

Casual guests to our licensed and/or gaming premises will be required to sign in each time they visit and provide their name, residential address and name of the Bendigo District RSL member/s of whom they are a guest. Persons wishing to access our gaming facilities will be required to provide proof of legal age (i.e. date of birth).

We may take (or may arrange another person to take) photographs and electronic images of you whilst on our premises. By attending our premises, you acknowledge and agree that such photographs and other images are owned by Bendigo District RSL, and we may use them for promotional or other purposes without your further consent being necessary. It is also legally mandatory for gaming venues to record and store CCTV footage for a minimum of 30 days and by using these facilities you agree to this occurring. Bendigo District RSL may also use facial recognition as a means of ensuring banned and self-excluded patrons do not enter Bendigo District RSL's premises.

Sensitive information is a type of personal information that also includes information or an opinion about someone's racial or ethnic origin, political opinions, membership of a political association,

professional or trade association or trade union, religious beliefs or affiliations or philosophical beliefs, sexual preferences or practices, criminal record and health, genetic information or disability.

If it is reasonably necessary in the circumstances and permitted by the Australian Privacy Principles contained in the *Privacy Act 1988 (Cth)*, we may also collect sensitive information such as a person's medical history, nationality, their ethnic background or disabilities. We will assume consent to the collection of all sensitive information that is provided to us for use in accordance with this Policy, unless told otherwise.

How and why do we collect and use your personal information?

Bendigo District RSL collects personal information reasonably necessary to carry out our business, to assess and manage our members' needs, comply with our obligations under Victorian Gambling and Casino Control Commission, and provide hospitality, gaming and recreational services. We may also collect information to fulfil administrative functions associated with these services, for example billing, entering into contracts with you or third parties and managing member relationships.

The purposes for which we usually collect and use personal information depends on the nature of your interaction with us, but may include:

- managing, planning, advertising and administering events and promotions;
- researching, developing and expanding our facilities and services;
- informing you of our activities, events, facilities, services and promotions;
- maintaining the security of our facilities;
- for identity verification purposes, particularly under the Liquor Control Reform Act 1998, and the Gambling Regulation Act 2003;
- recruitment processes (including for volunteers, traineeship and work experience);
- facilitating operational and administrative requirements; and
- responding to enquires and complaints.

Bendigo District RSL generally collects personal information directly from you – including over the phone, by email, over the internet or social media (through Bendigo District RSL, Bendigo Military Museum or Bendigo District RSL Veteran Support Facebook or Instagram pages) or in person. We may also collect personal information about you from other sources, for example:

- our industry partners (including RSL Victoria and Community Clubs Victoria);
- referees you have nominated, whether for membership or employment purposes; and
- third party suppliers and contractors who assist us to operate our business.

Circumstances in which we may collect your information include when you:

- become a member of Bendigo District RSL;
- enter our premises;
- provide details to us in an application, consent form, survey, feedback form, complaint or incident report;
- access our websites, or contact us via email, telephone, mail or engage with us via social media;

- participate in any program, activity, promotion, competition or event run by Bendigo District RSL;
- make an enquiry regarding a dining, hospitality or other function or event held at our venue; or
- nominate for, or are elected or appointed to the Sub-Branch Committee or a sub-committee of the Bendigo District RSL.

Bendigo District RSL also collects and uses personal information for market research purposes and to innovate our delivery of products and services. By electing to access our facilities or to acquire our services, you will be deemed to consent to us using your personal information in a manner consistent with this Policy.

You can always decline to give us any personal information we request, but that may mean we cannot provide you access to our premises and/or with some or all of the services you have requested, or to participate in our events, programs or activities we manage or deliver.

How do we interact with you via the internet?

You may visit our website (www.bendigorsl.com.au) without identifying yourself. If you identify yourself (for example, by providing your contact details in an enquiry), any personal information you provide to us will be managed in accordance with this Policy.

Cookies

Bendigo District RSL's website uses cookies. A "cookie" is a small file stored on your computer's browser, which assists in managing customised settings of the website and delivering content. We collect certain information such as your device type, browser type, IP address, pages you have accessed on our websites and on third-party websites.

Our website may contain links to third-party websites. Bendigo District RSL is not responsible for the content or privacy practices of websites that are linked to our website.

How do we hold information?

Bendigo District RSL stores information in paper-based files or other electronic record keeping methods in secure databases. We take reasonable steps to protect your personal information from misuse, interference and loss and from unauthorised access, modification or disclosure.

Bendigo District RSL maintains physical security over paper and electronic data stores, such as through locks and security systems at our premises. We also maintain computer and network security, for example, we use encryption, firewalls (security measures for the internet) and other security systems such as user identifiers and passwords to control access to our computer systems. We take steps to destroy or de-identify information that we no longer require.

Our website does not necessarily use encryption or other technologies to ensure the secure transmission of information via the internet, and we do not warrant the security of any such information that you transmit to us electronically. Users of our website are encouraged to exercise care in sending personal information via the internet.

How and why do we use and disclose personal information?

Bendigo District RSL, and third parties to whom we may disclose personal information in accordance with this Policy, may use your personal information to:

- verify your identity;
- complete background checks;
- provide hospitality, gaming, commemorative and welfare related services to you as a patron, member or visitor;
- provide member and venue-related benefits to you;
- provide employment to you as an employee of Bendigo District RSL;
- research, develop, run, administer and market programs, activities, competitions and other events relating to our services and activities;
- research, develop and market products, services, merchandise and special offers made available by us and third parties;
- respond to emergency situations, including those which may involve or require medical treatment;
- administer, manage and provide you with access to our website; and
- keep you informed of news and information relating to various our events, activities and opportunities via various mediums.

Bendigo District RSL will also use and disclose personal information for a range of administrative, management and operational purposes, including:

- administering billing and payments and debt recovery;
- planning, managing, monitoring and evaluating our services;
- quality improvement activities;
- statistical analysis and reporting;
- training staff, contractors and other workers;
- responding to enquiries and complaints regarding our services; and
- obtaining professional and legal advice.

Where permitted by law, we may disclose your personal information to a range of organisations which include, but are not limited to:

- companies we engage to carry out functions and activities on our behalf, including direct marketing;
- companies who are involved with our rewards/loyalty programs;
- our affiliated third parties (such as sponsors and suppliers) with whom we have commercial relationships for business, marketing and related purposes;
- our professional advisers, including our accountants, auditors and lawyers;
- our insurers;
- the Victorian Gambling and Casino Control Commission;
- Liquor Control Victoria

- relevant welfare bodies for the purposes of providing help to those veterans and or dependents who reach out to the Sub-Branch; and
- in other circumstances permitted by law.

Third parties to whom we have disclosed your personal information may contact you directly to let you know they have collected your personal information and to give you information about their privacy policies.

Do we use or disclose your personal information for direct marketing?

Bendigo District RSL may use or disclose your personal information for the purpose of informing you about our membership, services, upcoming promotions and events, or other opportunities that may interest you. If you do not want to receive direct marketing communications, you can opt-out at any time by contacting us using the contact details below.

If you opt-out of receiving marketing material from us, we may still contact you in relation to our ongoing relationship with you and/or following legislative guidelines.

Do we disclose your personal information overseas?

Typically, we will store personal information at our premises, or with our service providers, in the State of Victoria. However, in some circumstances your personal information may be transferred outside the State of Victoria, or outside Australia, where service providers with whom we may share that information under this Policy are located outside Victoria or Australia. In addition, it is possible that we, or our service providers, will utilise cloud technology in connection with the storage of personal information, and it is possible that this may result in trans-border transfer or storage of your personal information.

By providing your personal information to us, you consent to our disclosure of your personal information to trans-border recipients in accordance with this section. If you have any queries regarding the transfer of your personal information, please contact us using the details provided below.

How can you access or seek correction of your personal information?

We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up to date. You can help us to do this by letting us know if you notice errors or discrepancies in information we hold about you and letting us know if your personal details change. However, if you consider any personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading you are entitled to request correction of the information. After receiving a request from you, we will take reasonable steps to correct your information.

You are entitled to access your personal information held by us on request. To request access to your personal information please contact Bendigo District RSL's General Manager using the contact details set out below. You may be charged for the reasonable time and expense incurred in compiling information in response to your request.

We may decline your request to access or correct your personal information in certain circumstances in accordance with the Australian Privacy Principles. If we do refuse your request, we will provide you

with a reason for our decision and, in the case of a request for correction, we will include a statement with your personal information about the requested correction.

How can you contact us?

You may contact Bendigo District RSL's Privacy Officer at any time if you have any questions or concerns about this Policy or about the way in which your personal information has been handled, via the following:

Att: General Manager
Bendigo District RSL
73-75 Havilah Road, Bendigo VIC 3550
office@bendigorsl.com.au
(03) 5442 2950

Complaints must be made in writing and addressed to the above. We may ask you to provide further information about your complaint and the outcome you are seeking. We will then typically gather relevant facts, locate and review relevant documents and speak with individuals involved. In most cases, we will investigate and respond to a complaint within 30 days of receipt. If the matter is more complex or our investigation may take longer, we will let you know.

If you are not satisfied with our response to your complaint, or you consider that Bendigo District RSL may have breached the Australian Privacy Principles or the Privacy Act, a complaint may be made to the Office of the Australian Information Commissioner. The Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992 or by using the contact details on the website www.oaic.gov.au

How changes are made to this Policy?

Bendigo District RSL may amend this Privacy Policy from time to time, with or without notice to you. We recommend that you visit our website regularly to keep up to date with any changes.