Privacy policy

This and the following pages tell you about our privacy policy.

This policy sets out our commitment to protecting and dealing properly with your personal information and to meeting our requirements under the *Privacy Act* and the *Australian Privacy Principles*.

This policy applies across all of our operations including our registered club “The Canberra Tradesmen’s Union Club” trading as “The Tradies Dickson”, ABN: 17 098 615 760, The Quality Hotel Dickson, ABN: 17 098 615 760 and the fitness centre trading as “Team Fitness” ABN: 17 098 615 760.

We respect the privacy of your and other’s personal information.

We publish this policy on our website and also publish this policy within our venues, so that you can be aware of when we might be collecting personal information about you, and how that personal information is dealt with.

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Phone: 6162 5656
Email: privacymanager@thetradies.com.au
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Privacy policy details

Background

We collect personal information on most individuals who deal with us or who access our website or interact with us through social media.

That includes information about members and their guests and other individuals who are members or patrons of any of our venues or who attend a function at any of our venues, about individuals who are themselves (or who are employees of) of suppliers, consultants and contractors who deal with us or otherwise provide services or advice to us, and about individuals in other organisations who have oversight over us or any of our operations.

In almost all cases where we collect personal information it would be impracticable for us to deal with you if you did not identify yourself or used a pseudonym. So we usually do not offer you the option of not identifying yourself or of using a pseudonym.

What is personal information?

The kinds of personal information that we collect can include –

- names, residential email and other addresses, telephone numbers, social media participation details, gender, age, interests (including hobbies and sports),

- other types of information or opinions about individuals that is within the definition of "sensitive information" under the privacy legislation such as information concerning health or medical matters, racial or ethnic origin, political opinions or memberships, religious beliefs or affiliations, philosophical beliefs,

- memberships of other organisations, sexual preferences, or criminal records, occupation, PINs or passwords that you may use in connection with your interactions with us, preferences and sensitivities, details from drivers licences and other forms of identification that are produced to us, credit savings and debit card details,

- details of points of contact with the club, photographs, live or recorded CCTV or video or, facial and other biometric information,

- location or activity information including location or activity information derived from the use of computers or mobile devices, and details of activities with or within the club or dealings with the club.

That is not an exhaustive list. For example, we sometimes need to collect additional information to authenticate you, or to better assist us to interact with you – to give just one example, to obtain your preferences for a function booking.

What information do we collect?

We only collect personal information where we feel that is reasonably necessary for or directly related to our functions or activities or the proper conduct, legal compliance, security or safety of our operations.

Sensitive information

We to not collect sensitive information (as defined in the privacy legislation) about you without your consent (which will be implied where you choose to provide the information, or you choose to deal with or interact with us where sensitive information might be obtained as outlined in this policy) – except where that is otherwise permissible under the privacy principles.

How do we collect your personal information?

We collect that personal information in many ways including –

- through membership applications and details of updates and changes, driver's licence or other identity documentation that you may produce;
- booking forms, use of membership and rewards cards and other forms of identification to obtain entry to a venue or participate in gaming or other activities in a venue,
- use of membership and rewards cards and other forms of identification in connection with any transaction with us or within any of our venues,
- sports/gym/function/booking registrations and other forms, sign in registers,
- credit savings and debit card information from credit savings or debit card transactions, bank details from cheques or online payments,
- records (including automated digital records based on activities) of website contact and use and social media contact and use, internet usage generally,
- observations by club staff, equipment used at point of entry, surveillance equipment used within our venues including CCTV and facial recognition and other cameras and equipment and temperature monitoring equipment, and gathering information collected by sub clubs.

Some personal information may be collected by our staff creating or adding to particular records to record observations or opinions. Some personal information may be collected by monitoring equipment, software or the like without staff interaction.

We may also collect personal information from publicly available sources of information or from others with whom we deal in connection with you including (if you are a member or proposed member, or if you are a proposed supplier, consultant or contractor), others who may put you forward or speak about you.

It is usually not practicable for us to remind you at each point or time of interaction, that personal information is being collected. If you choose to deal with us in any of the circumstances outlined, then you must be aware that your personal information may be collected.

What happens if you do not provide your personal information?

In many cases, if you are not prepared to provide personal information or allow us to collect personal information in our usual way then we will not be able or may not be prepared to deal with you or you may not be able to exercise particular rights or enjoy particular benefits or we may not be able to provide you with the level of service normally offered.

In most cases that will be because the transaction or interaction (or our proper management of the transaction or interaction) will depend on you supplying personal information. In other cases, if you are not prepared to provide personal information or allow us to collect personal information in our usual way, then it will not be practicable for us to make a special case for you and change our systems to avoid collecting your personal information.

If we receive personal information about someone that we did not solicit (either directly or by facilitating the provision of that information to us) then within a reasonable period after receiving the information we aim to destroy the information or ensure the information is de-identified.

How do we store your personal information?

We store personal information and records containing personal information in a number of different ways and in a number of different places including – digital and physical records at initial points of contact; physical records generated at the point of a transaction (including cash register dockets);

digital and physical records maintained at our various premises; digital records including images at on-site equipment and also off-site servers in the cloud only in Australia but possibly elsewhere.

In most cases where personal information is stored in the cloud, it cannot be accessed by the cloud service provider due to password protection or encryption.

Security of your information

We endeavour to take reasonable other steps including in relation to physical and digital security, to generally better secure our operations including our records of personal information and to protect the confidentiality of information that we hold.

However, we cannot guarantee that in every individual case at every time: and also, that cannot guarantee the physical or digital security of a particular record. While we take security steps ourselves you should also be aware of the types of information security risks that exist and take appropriate care to help safeguard yourself and your information.

Those risks include possible accidental disclosure or misuse and also the possibility of malicious hacking or other unauthorised access.

Why do we collect your personal Information?

The purposes for which we collect, hold, use and disclose that personal information include:

- managing our records of and interactions with our members, patrons, suppliers and other contacts;
- to obtain references and credit reports; to collect amounts owing to us and to enforce our rights; managing responding to public health or other safety or welfare risks and cooperating with authorities and public officials in that regard, by way of business records for the management and administration of our operations;
- for marketing analysis and promotional purposes;
- in order to meet our numerous legal compliance and other obligations;
- in relation to guests, to meet the identification and registration requirements applicable under the clubs legislation;
- to identify, verify and check in those we deal with; in relation to members, in the application of our internal processes for dealing with members including disciplinary processes;
- in order to meet our obligations including how we see our obligations as a good corporate citizen, in circumstances where the release of personal information is permissible under the privacy principles;
- and in order to keep our records and manage our operations in a modern and efficient manner.

Sharing personal information with third parties

We do not provide your personal information to third parties simply for their own commercial use.

We may share with the police, regulators and other public officials, any recorded details of suspected illegal or undesirable activity of any nature including associated personal information. We may also disclose your information to police or regulatory authorities, including to meet our legal obligations.

We may choose or be required to share data including personal information, including possibly in real time, with third parties who assist us with the conduct of our operations or with authorities,

regulators or other public bodies (for example in the latter case, in pandemic situations to facilitate contact tracing – but that doesn't limit the other possibilities).

Sometimes that may involve providing your personal information to third parties (but only within Australia) including - outside organisations who provide services or advice to us or act on our behalf in relation to any of the types of matters listed above including consultants and contractors and also professional and other advisers, but not for their own commercial use.

We are a public company and in limited circumstances we can have a legal obligation to allow others to look at our Register of Members.

We may also disclose your information to one or more other registered clubs in relation to an amalgamation or proposed amalgamation or in relation to exclusion or self-exclusion from venues.

We may introduce you to other people or parties or provide links or references to other places or websites. In each such case you need to satisfy yourself regarding how those others approach privacy matters – they are likely to have different policies.

If you provide personal information to us or deal with us in a way that leads to the collection of personal information as outlined in this policy, then we presume your consent to deal with the information in accordance with this policy.

We will not use what the privacy legislation defines to be sensitive information about you, for the purposes of direct marketing based on that sensitive information unless the circumstances have made it clear that you specifically consent to that.

How we use your personal information

Where we use your personal information for direct communication with you for promotional purposes, we will take reasonable steps to allow you to give notice opting out for future periods.

Where we do seek to communicate directly with you we automatically assume that we have your authority to do so using any address or other point of contact that we are aware of for you and use the post or any media including social media, email or SMS. We may contact you in any of those ways even concerning confidential information or sensitive information in connection with you.

In some situations where you are dealing with us, you may still have the opportunity to opt out of providing particular personal information such as by not choosing to use a member or reward card within the club in situations where we have not made that mandatory for compliance purposes or where we determine that the provision of particular information is not needed by us in the particular circumstances.

If you are a member, there are certain materials such as notices of meeting that we are obliged to send to you and while you continue as a member you cannot opt out of those.

Accuracy of your personal information

We take reasonable steps to keep your personal information that we have collected, accurate. That involves – making any correction that becomes apparent to us as necessary, acting on updates from you, and also making any correction under the process outlined below.

Accessing your personal information

You have a right to access your own personal information that is held by us to the extent we are required to give you access under the privacy legislation and privacy principles and subject to the limitations directly or necessarily arising under the legislation or principles. We may apply a reasonable administrative charge for providing that access.

We normally keep personal information indefinitely as it is difficult to identify any particular time when particular personal information ceases to be relevant.

However to the extent of personal information that is obtained in connection with a register of guests who enter our premises where the register is required under the clubs legislation, and which information forms part of a register (which may include identification information such as drivers licence details and copies of identification materials that you produce), we will usually not maintain that register beyond three years after the date of the entry in the register except where we have a reasonable basis for anticipating that the particular register may still be needed in evidence at some later time.

We apply the Australian Privacy Principles guidelines issued by the Australian Information Commissioner, as we administer this policy and particularly in relation to matters that are not specifically addressed in this policy.

If we become aware of a serious data security breach then we will act on that breach including where applicable, applying the Australian Information Commissioner's Guide for data breach notification.

Our executive with the day-to-day responsibility for administering this policy is our Privacy Manager who operates from our 2 Badham St Dickson premises.

If you establish to our reasonable satisfaction that any of your personal information that you access is incorrect then we will promptly make the appropriate correction in our records.

Complaints

If you have any complaint about any aspect of our dealing with your personal information, you may make that complaint to our Privacy Manager who will promptly investigate to see whether your personal information has been dealt with properly under this Policy.

We will provide you with a written response to your complaint promptly after we have completed our investigation. Any response that we provide is provided on a confidential basis however and without admission.

Changes to our privacy policy

From time to time, we may decide or have to update this policy. The policy applicable at a particular time is the most current policy published by us at the time and it applies to all personal information that we then hold.

Further information on the Tradies Group's privacy policies and procedures can be obtained by contacting the Privacy Officer using the contact details below:

The Privacy Manager
The Tradies
2 Badham St Dickson ACT 2602

Telephone: 02 6162 5656 Email: privacymanager@thetradies.com.au

This version of the policy was adopted by the Board on 5 March 2021.