

**Policy No:** PD.5.02/2025

**Policy Title:** Privacy and Disclosure of Information Policy

**Effective Date:** February 2025

### Organisational Commitment

The Caloundra Sub Branch RSL and Services Club Inc. believes that privacy is an important individual right that should be extended to our employees, members, suppliers and any relevant others and we are therefore committed to respecting the privacy of all personal information.

Caloundra Sub Branch RSL is committed to ensuring that dealings with personal information of anyone with whom we deal must comply with Australian Privacy Laws including the Privacy Act 2009 and amendments there- after.

### Purpose

The following policy outlines how we manage the personal information of our employees, members and suppliers and any relevant others with respect and in accordance with current Privacy Laws where they are applicable to the Caloundra Sub Branch RSL and Services Club Inc.

### Definitions

“Personal Information” means recorded information or opinion, whether true or not, about a living individual whose identity can be ascertained.

Personal information may include, but not limited to, a person's name, contact details, sex, age, and financial details (e.g., bank details, wages or salary information) marital status, education or employment history.

Some information is called “sensitive information” and given special treatment. Sensitive information includes, but not limited to, data about ethnic origin, religious beliefs and criminal record.

### Collection of Information

Information collected by Caloundra Sub Branch RSL and Services Club Inc. will be collected by an authorised employee of the Club. Caloundra Sub Branch RSL and Services Club Inc., employees have been screened and signed workplace agreements and polices, which ensure personal information to which they may become privy through the course of their employment, is confidential.

### *Refer to Proprietary Information Policy*

Usually, the type of information that we collect includes, but is not limited to:

- Employees and potential employees
- Job seeker or consultant information submitted by resume, CV or application
- Information obtained from reference and background checks
- Employment, Superannuation, Bank and Emergency Contact information supplied by the employee,
- Work performance information
- Members Loyalty Information
- Members application information which must be signed by the applicant
- All member information will be collected from the member and membership activities only.

Caloundra Sub Branch RSL and Services Club Inc. will not do anything, or engage in any practice, that contravenes any information protection principles including the following:

- Not collect personal information unless:
  - a) The information is collected for a lawful purpose that is directly related to a function or activity of the Caloundra Sub Branch RSL and Services Club Inc.
  - b) The collection of the information is reasonably necessary for that purpose;
- Not collect personal or commercial information by an unlawful means.

Any visitor to the Caloundra Sub Branch RSL and Services Club Inc. website may do so without revealing the identity or any personal information.

In accordance with current standards, our servers automatically recognise and record each visitor's source IP address, data and time of visit, and pages viewed, but only discloses to us anonymous, statistical data, which we need to evaluate our web site performance and generally improve the website overtime.

### **Use and Disclosure of Information**

#### **A: Applicant / Employee / Contractor Information:**

Caloundra Sub Branch RSL and Services Club Inc. may collect and hold information during (whichever applies)

- The recruitment process to become an employee or contractor
- The employment relationship
- The contracting relationship

We collect the information for the purpose of that process or relationship. In most cases we collect personal information from the individual. However, we may collect personal information from third parties. Those third parties may include referees, licensing authorities, recruitment agencies, medical practitioners and personal communications.

For an applicant for an employment or contracting position, the personal information the Caloundra Sub Branch RSL and Services Club Inc. may collect includes: name, contact details, professional details, and qualifications, past employment history, health, fitness and psychological profiles and police records.

Health related and police checks will only be conducted with consent.

Caloundra Sub Branch RSL and Services Club Inc. only perform reference checks with referees nominated by an applicant having gained consent from the applicant.

If the applicant is selected to become an employee or contractor, we will retain the information collected during the recruitment process and may collect and hold additional personal information for the purpose of employment or contract.

Caloundra Sub Branch RSL and Services Club Inc. will store personal information securely. Access will only be allowed to those authorised.

#### **Caloundra Sub Branch RSL and Services Club Inc. may disclose information to:**

- Potential employers (we do not issue personnel references we will issue a "Statement of Service")
- Nominated references
- Anybody to whom we are required by law to disclose information (eg. Australian Taxation Department, Department of Human Services, Centrelink etc.)
- A competent Organisation that conducts background and criminal checks (provided that the organisation and request complies with privacy laws)

- To educational or vocational organisations to the extent necessary to verify qualifications
- Where serious misconduct is alleged with legal implications, information may be provided to the police or investigators

## **B: Member Information**

The Caloundra Sub Branch RSL and Services Club Inc. is committed to ensuring the privacy of all member information. We collect information, from information supplied by the member in their application. We will not disclose member information to any third party or sell information to any data collection or marketing agents.

The Caloundra Sub Branch RSL and Services Club Inc. will only use personal information for the purpose which it was collected. Caloundra Sub Branch RSL and Services Club Inc. may use member information for Caloundra Sub Branch RSL and Services Club Inc. Direct Marketing (e.g., sending out the Club Magazine) and Membership purposes.

Caloundra Sub Branch RSL and Services Club Inc. undertakes to use information if it has a demonstrable relevance to the particular use to which it is being put and such other purposes as are subsequently agreed to by the member.

Caloundra Sub Branch RSL and Services Club Inc. undertakes to use information in such a manner as to take into account the possibility that it is not of sufficient quality for the purpose, e.g., because it is inaccurate, out of date, incomplete or out of context.

## **CCTV**

The Caloundra Sub Branch RSL and Services Club Inc. CCTV system is primarily intended to provide an increased level of service, safety, and security in the club environment. The use of CCTV is part of an integrated security approach that includes several strategies, including security presence, access control and alarms. CCTV systems may also be used for managing access control and will not be used to invade the privacy of an individual.

The system will be used for (but not limited to) the following purposes:

- To limit, deter and detect crime and criminal damage;
- To identify, apprehend and assist in prosecuting offenders;
- To aid in public order, RSA and behaviour
- To improve communications and operational response of staff;
- To assist emergency services;

The CCTV System consists of numerous cameras, some of which have audio recording ability, situated on Caloundra Sub Branch RSL and Services Club Inc. property including the Courtesy Buses. All data collected using this system including images, will be managed in accordance with the relevant Federal and State Laws as well as Caloundra Sub Branch RSL and Services Club Inc. Policies.

All Persons involved in the operation of the system are obliged to exercise the utmost care to prevent improper disclosure of material.

Signs that CCTV cameras are operating will be displayed at key positions to allow people to be made aware that CCTV systems work within the Caloundra Sub Branch RSL and Services Club Inc. and grounds.

Monitoring of CCTV and liaison with external agencies (e.g., Police and Liquor Licensing) will be the responsibility of the Senior Operations Manager, Compliance Manager or Duty Manager. All Data is kept for a minimum of 28 days and incidents kept for a minimum of 5 years.

Consistent with standard operating procedures relevant matters will be reported to authorities. A record of any report will be made at the time and will include incident, date and time of the report and details of the officer taking the report. Authorities may request a copy of the incident data. All incidents requiring attendance by authorities will be reported to the Senior Operations Manager and General Manager.

Recorded material will be used only for lawful purposes defined in this policy. Access to recorded material will only take place as defined in this policy. Recorded material will not be sold or used for commercial purposes.

Any misuse of this system or materials produced as a consequence which is frivolous, or for private purposes, or is otherwise inconsistent with the objectives outlined in this policy may attract disciplinary actions up to and including those attached to instances of serious misconduct.

### Facial Recognition Cameras

It is likely that when you are at the Club's premises, your face will be analysed by the Club's facial recognition technology.

Designated facial recognition cameras located throughout the Club's premises use facial recognition technology to collect and analyse the "face prints" of individuals.

A "face print" is a set of biometric characteristics (such as information about the relative location, size and shape of an individual's facial features) which is used to uniquely identify an individual's face and is expressed as a mathematical algorithm.

When you are at the Club's premises, the Club's designated facial recognition cameras will capture a photo of your face, analyse your facial features in that image and then create a "face print" of your face based on that photo.

Your "face print" will then be compared against a secure database maintained by the Club that contains the "face prints" of individuals who have been suspended, banned or self-excluded from the Club's premises.

If your "face print" matches the "face print" of an individual who has been suspended, banned or self-excluded from the Club's premises, the Club's management will be alerted and your ID checked. Once positive identification has been achieved, steps will be taken to remove you from the Club's premises. The "face print" created using the image captured by the Club's designated security cameras will be deleted after the alert has been sent to the Club's staff.

If your "face print" does not match the "face print" of an individual who has been suspended, banned or self-excluded from the Club's premises, your "face print" will be immediately deleted.

For the purposes of enabling the "face print" matching referred to above, if an individual has been suspended, banned or self-excluded from the Club's premises, the Club will collect a copy of that individual's "face print" from a photo of that individual held by the Club (e.g. from the photo on the individual's membership card) and will hold a copy of that "face print" for so long as the individual is suspended, banned or self-excluded from the Club's premises.

The Club has introduced facial recognition technology at the Club's premises to enhance the Club's security procedures and assist the Club to identify and remove persons who have been suspended, banned or self-excluded from the Club's premises. The Club does not use your "face print" for any other purpose.

The temporary collection of your "face print" is reasonably necessary for the activities and functions of the Club.

The Club will not store your "face print" unless you have been suspended, banned or self-excluded from the Club's premises.

### Data Quality and Security

Caloundra Sub Branch RSL and Services Club Inc. takes reasonable steps to make sure that the personal and commercial information it collects and uses is up to date.

Caloundra Sub Branch RSL and Services Club Inc. takes reasonable steps to ensure that personal information we hold is secure and protected from misuse, loss, unauthorised access, modification or disclosure.

Reasonable steps are taken to hold information secure in an electronic or physical form. Information is stored in access - controlled premises or in electronic databases requiring logins and passwords. All staff having access to confidential information are subject to confidentiality obligations.

*Further information is available in the Proprietary Information Policy.*

## Access and Correction

The Person, to whom personal information pertains, may request access to the personal information the Caloundra Sub Branch RSL and Services Club Inc. holds.

The procedure for gaining access is as follows:

- All requests for access to personal information must be made in writing and addressed to the General Manager.
- You will be asked to verify your identity
- Depending on your request for information you will be forwarded your information by mail or email
- You will be given the opportunity to correct any personal information which is no longer accurate

To update details:

- Staff Members need to fill out a "Change of Details" form available from the People and Culture Dept or Reception.
- Members should fill out a "Change of Details" form available from Reception

## Breaches of Security or Privacy

If you believe that your privacy has been infringed or that the principles referred to in this policy have not been followed or they have contravened please contact the General Manager at the Caloundra Sub Branch RSL and Services Club Inc. We will treat your request with the utmost importance and urgency.

## Compliance

All violations of this policy will be investigated, with the assistance of legal advisors (where required) to determine appropriate action to be taken. Employees who breach this policy will be subject to disciplinary measures up to and including immediate dismissal and in applicable cases legal action.

## Review

This Policy will be reviewed annually or as amendments and updates to the Privacy Act 2009 and associated laws occur.

Review required before February 2026

## Acknowledgement

I \_\_\_\_\_ (full name) have read and understand the above information relating to the Club, Privacy and Disclosure of Information Policy I understand that this policy is binding on me but does not form part of my employment contract.

	Signature	Date
Employee		
Supervisor / Manager		

*Copy to personal file*