



CANBERRA RACING CLUB

PRIVACY POLICY

OUR COMMITMENT

The purpose of this Privacy Policy is to outline how the Canberra Racing Club (“the Club”) manages, collects, deals with, protects and allows access to *personal information* in accordance with the *Privacy Act 1988 (Cth)* (the **Privacy Act**) and the Australian Privacy Principles (the **APPs**). The Club understands the importance placed on the privacy of your *personal information*. The Club will endeavour to make you aware of the contents of this Privacy Policy before or as soon as reasonably practicable after collecting any *personal information* about you.

This Privacy Policy is available at our website at www.thoroughbredpark.com.au

We may be contacted at any time at 02 6204 0000.

SCOPE

This Privacy Policy applies to our management of the *personal information* of our members, clients, customers, stakeholders, suppliers and prospective employees. This Privacy Policy does not apply to our acts and practices which relate directly to the employee records of our current and former employees.

WHY DO WE COLLECT, HOLD, USE AND DISCLOSE *PERSONAL INFORMATION*?

We collect, hold, use and disclose personal information for the following purposes:

- Process employee and potential employee information;
- Process membership applications;
- Meet statutory requirements under the relevant legislations;
- Contact members, guests and stakeholders about promotions and activities conducted by the Club;
- Promote sponsors.

Unless otherwise provided by law, we will not collect, hold, use or disclose *sensitive information* without your consent.

If you would like to access any of our services on an anonymous basis or by using a pseudonym, please inform the Club. However, the Club will require you to identify yourself if:

- the Club is required by law to deal with individuals who have identified themselves; or
- it is impracticable for the Club to deal with you if you do not identify yourself or elect to use a pseudonym.

Please be aware that your request to be anonymous or to use a pseudonym may affect our ability to provide you with the requested membership and/or services.

WHAT KIND OF *PERSONAL INFORMATION* DO WE COLLECT AND USE?

The nature and extent of *personal information* that the Club collects varies depending on your particular interaction with the Club and the nature of our functions and activities.

Personal information that the Club commonly collects, holds, uses and discloses could include your name, position, date of birth, current address, facsimile numbers, email address, telephone numbers, next of kin, tax file number, education details, Australian Business Number, bank details, business references, financial details, details about your business, drivers licence number and preferred means of contact, professional credentials, hobbies and interests.

HOW DO WE COLLECT AND HOLD *PERSONAL INFORMATION*?

Where possible, the Club will collect *personal information* directly from you. The Club collects information through various means, including interviews, appointments, forms and questionnaires (whether in hardcopy or electronic format, including information submitted via our website or other electronic means). Should you feel that the information that the Club is requesting, either on our forms or in our discussions with you, is not information that you wish to provide, please feel free to raise this with the Club.

In some situations we may also obtain *personal information* about you from a third party source. If the Club collects information about you in this way, we will take reasonable steps to contact you and ensure that you are aware of the purposes for which we are collecting your *personal information* and the organisations to which the Club may disclose your information, subject to any exceptions under the Privacy Act.

If we receive unsolicited *personal information* about you that the Club could not have collected in accordance with this Privacy Policy and the Privacy Act, the Club will within a reasonable period, destroy or de-identify such information received.

The Club's internet service provider may record details of visits to the Club's site and when visiting our site your visit may be logged and the following information may be collected:

- your server address, domain name and browser type;
- the date and time of your visit to the site;
- the pages accessed and the documents downloaded;
- the previous website visited;
- your operating system; and
- the links you followed from other sites to get to our site.

The information listed above will only be used by the Club internally for statistical and research purposes.

WHEN DO WE USE AND DISCLOSE YOUR *PERSONAL INFORMATION*?

We will only use and disclose your *personal information*:

- if the Club gets your consent; or
- for purposes which are related to the purposes for which the information was collected, in accordance with this Privacy Policy and the Privacy Act.

For the purposes referred to in this Privacy Policy, we may disclose your *personal information* to other parties including:

- your referees;
- your former employers;
- credit agencies; and
- the Club's professional advisors, including our accountants, auditors and lawyers;
- the Club's contractors and suppliers.

The Club will only use or disclose your *personal information* for the purposes of direct marketing if:

- the Club collected the information from you;
- it is reasonable in the circumstances to expect that the Club would use or disclose the information for direct marketing purposes;
- the Club provides you with a simple means to 'opt-out' of direct marketing communications from the Club; and
- you have not elected to 'opt-out' from receiving such direct marketing communications from the Club.

DO WE SEND INFORMATION OVERSEAS?

It is unlikely that we will disclose *personal information* to overseas recipients.

If the Club discloses *personal information* to overseas recipients, the Club will take reasonable steps to ensure that such recipients do not breach the Privacy Act and the APPs unless:

- the Club believe that the overseas recipient is subject to a law that has the same effect of protecting *personal information* in a way that, overall, is at least substantially similar to the way in which the Privacy Act and the APPs protect *personal information* and there are mechanisms available for you to access to take action to enforce that protection of law; or
- the Club obtains your express consent to the disclosure of *personal information* to overseas recipients.

ACCESS TO AND CORRECTION OF YOUR *PERSONAL INFORMATION*

You have a right to access your *personal information*.

The Club is not obliged to allow access to your *personal information* if:

- the Club reasonably believe that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety;
- giving access would have an unreasonable impact on the privacy of other individuals;
- the request for access is frivolous or vexatious;
- the information relates to existing or anticipated legal proceedings between you and the Club and would not ordinarily be accessible by the discovery process in such proceedings;
- giving access would reveal our intentions in relation to negotiations with you in a way that would prejudice those negotiations;
- giving access would be unlawful;
- denying access is required or authorised by or under an Australian law or a court/tribunal order;
- the Club has reason to suspect that unlawful activity, or misconduct of a serious nature relating to the Club's functions or activities has been, is being or may be engaged in and giving access would be likely to prejudice the taking of appropriate action in relation to the matter;
- giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
- giving access would reveal internal evaluative information in connection with a commercially sensitive decision-making process.

The Club will also take reasonable steps to correct *personal information* to ensure that, having regard to the purpose for which it is held, it is accurate, up-to-date, complete, relevant and not misleading if:

- the Club is satisfied the information is inaccurate, out-of-date, incomplete, irrelevant or misleading, having regard to a purpose for which it is held; or
- you request the Club to correct the information.

If you make a request for access to or correction of *personal information*, the Club will:

- respond to your request within a reasonable period; and
- if reasonable and practicable, give access to or correct the information in the manner requested.

If the Club refuses to give access to the *personal information* because of an exception or in the manner requested by you, the Club will give you a written notice that sets out at a minimum:

- the Club's reasons for the refusal (to the extent it is reasonable to do so); and
- the mechanisms available to complain about the refusal.

If the Club refuses a request to correct *personal information*, the Club will:

- give you a written notice setting out the reasons for the refusal and how you may make a complaint; and
- take reasonable steps to associate a statement with *personal information* it refuses to correct.

The Club reserves the right to charge you reasonable expenses for providing access or making a correction to *personal information*, for example, a fee for photocopying any information requested by you.

Nothing in this Privacy Policy replaces other informal or legal procedures by which an individual can be provided with access to or to correct *personal information*.

INTEGRITY OF YOUR *PERSONAL INFORMATION*

The Club will take reasonable steps to:

- ensure that the *personal information* that the Club collects is accurate, up to date and complete;
- ensure that the *personal information* the Club holds, uses or discloses is, with regard to the relevant purpose, accurate, up to date, complete and relevant; and
- secure your *personal information*.

The Club will take reasonable steps to protect *personal information* from:

- misuse, interference and loss; and
- unauthorised access, modification or disclosure.

The Club will take reasonable steps to destroy or de-identify *personal information* that the Club holds if the Club no longer needs the information for the primary purpose for which the information was collected and the Club is not otherwise required by law to retain the information.

COMPLAINTS

If you would like to make a complaint about the way the Club collects, uses, discloses, stores or administers your *personal information*, or otherwise consider there may be a breach of the Privacy Act or the APPs, you may lodge a complaint under our Complaints Policy.

All complaints will be treated seriously and dealt with promptly. The Complaints Policy is the Club's way of ensuring your privacy concerns are raised and addressed promptly.

Our Complaints Policy can be obtained by contacting the Club's Privacy Contact Officer.

HOW TO CONTACT US

If you would like more information on privacy or have any questions in relation to this policy please contact the Club's Privacy Contact Officer:

PO Box 275, Mitchell, ACT 2911.

Phone: 02 6204 0000

You may also make a complaint directly to the Office of the Australian Information Commissioner (**OAIC**) online, by mail, fax or email. Please visit the OAIC website at <http://www.oaic.gov.au/privacy/making-a-privacy-complaint> for more information.

SUPPLEMENTARY ITEMS

LINKS TO OTHER WEBSITES

The Club's website may contain links to other websites; this Privacy Policy has no application to those websites.

ACCESS TO INFORMATION COLLECTED

Employees should note that if they use the Club's equipment, compliance with the Club's Internet, Email and Computer Use policy is mandatory. All internet sites and content accessed via the Club's equipment can be traced and is monitored.

PHOTOGRAPHY AND FILMING

Any photographs or digital material taken on behalf of the Club at Thoroughbred Park in respect of races or any promotional events or persons, main the property of the Club and may be used at its discretion.

The terms and conditions of entry to Thoroughbred Park stipulates that, in summary, the Club may use images of race day patrons for promotional purposes.

Policy Version and Revision Information

Policy Authorised by: Peter Stubbs Title: Chief Executive	Original Issue: January 2006
Policy Maintained by: Donna Berry Title: Executive Assistant	Date Revised: June 2014
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