



Royal Prince Alfred Yacht Club Privacy Policy

Purpose

The Royal Prince Alfred Yacht Club ("the Club") is committed to the protection of personal information provided to the Club by an individual. Any personal information provided to the Club will be used for the purpose for which the information is gathered and for purposes directly related to the functions and activities of the Club.

Privacy laws for organisations (including Registered Clubs) are covered by the Privacy Act (12 March, 2014), outlined in the Australian Privacy Principles (APPs) which can be found on the website of the Office of the Australian Information Commissioner

Definition of Personal Information

'*Personal Information*' means information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

The Club collects personal information from members when they join the club. This personal information includes; name, address, email, telephone, date of birth, occupation, details relating to other club memberships, identification checks, bank account details, vessel details (if applicable), preferred methods of communication and information on their preferred activities within the Club.

Collection, Use and Disclosure of Information

1.0 Royal Prince Alfred Yacht Club

- 1.1** The Club will not disclose any personal information obtained from members to other parties or use it for purposes other than those stated in this policy unless:-
 - a. Consent is provided (written or verbal)
 - b. There is a legal obligation to do so
 - c. The Club reasonably believes that there is a threat to an individual's life, health or safety, or public health or safety; or
 - d. The Club has reason to suspect that unlawful activity has been, is being or may be engaged in when personal information may be used or disclosed as a necessary part of any investigation and reporting to relevant persons or authorities.
- 1.2** The Club may not disclose personal information to third parties or overseas recipients or 'cloud' based database providers without the approval of the member.
- 1.3** The Club may disclose personal information to third parties that provide services to it when the contract requires the third party to keep personal information confidential and secure.
- 1.4** Personal information provided may be used by the Club for general membership administration and management purposes to improve its service and to provide the latest information about those services and promotions to the member. The Club may also publish from time to time, the names of members and vessel names in, for example membership lists, annual report, register of vessels, entry lists and race results.
- 1.5** The Club will take reasonable steps to make sure the personal information it collects, uses or discloses is accurate, complete and up to date.
- 1.6** Staff may access personal information held by the club to conduct their day-to-day administrative and accounting functions on behalf of members.
- 1.7** If the Club receives personal information about a member that it did not specifically request, the club will determine whether it would have been permitted to collect the information with the knowledge and consent of the member. If not, the information will be destroyed or de-identified.
- 1.8** The APP Privacy Policy outlines the access, correction and complaints processes.
- 1.9** The Club will obtain members' consent to receive marketing/promotional information on the club by providing an 'opt-out' opportunity with any unsolicited marketing/promotional offer.

- 1.10** The Club will only show email addresses individually by using the “bcc” option when sending group emails to members, other than when emailing Board and Committee members.
- 1.11** Financial information such as bank accounts and credit card details are not retained in the club’s electronic databases. These are only retained by the relevant bank. A written paper copy is retained by the club as evidence of authorisations and all but the first four and last three digits are blacked out. These records are retained in a locked safe at the club.
- 1.12** No personal information of any member is retained on the public website with the exception of race results where the skippers and boat names are disclosed.
- 1.13** Via the Member Portal found on the Club website, Members may log in, view or alter, or make visible to other members limited personal details using their own login and passwords. Members may also view and pay their accounts securely on line.
- 1.14** The Club will take reasonable steps to protect personal information from misuse, loss, unauthorised access, modification or disclosure. Information may be kept in hard copy and/or electronically. The Club will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for the purposes for which it was collected.

2.0 Members

- 2.1** Staff may facilitate member to member communication by advising the inquiring member that the Club will pass on their details to the other member and ask them to initiate the contact.
- 2.2** Members may complain about a breach of the *Australian Privacy Principles (APPs)* by sending their complaint in writing to the General Manager (or delegate) who will respond within seven (7) days.
- 2.3** Members must update/correct the information held by the Club by notifying the club in writing.
- 2.4** Members may request the personal details held by the club about themselves by making a written request to the General Manager.
- 2.5** The Club provides the option to members of dealing with them anonymously and/or provide the Club with a pseudonym. However, this option is open to exceptions, including where it’s impracticable for the club to deal with an individual who hasn’t identified themselves, such as in a membership renewal, or where the law requires or authorises the club to deal with individuals who have identified themselves. This means existing requirements under the *Registered Clubs Act* for the club to maintain a register of visitors overrides the pseudonymity/anonymity requirement in the *Privacy Act*.

Members are directed to a copy of the Club’s Privacy Policy when they become a member. The policy is also available to all members on request and is on the Club website www.rpayc.com.au.

If an individual does not provide the personal information the Club requests, the Club may not be able to provide the services and benefits associated with Club membership.

Royal Prince Alfred Yacht Club Board may amend this policy from time to time.