



# The RPAYC Privacy Policy

## **Purpose**

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

New privacy laws for organisations (including registered clubs) covered by the amended Privacy Act, came into effect on 12 March, 2014. The new laws are outlined in the Australian Privacy Principles (APPs) appended to this policy.

[http://www.oaic.gov.au/images/documents/AustralianPrivacyPrinciples\\_summary.pdf](http://www.oaic.gov.au/images/documents/AustralianPrivacyPrinciples_summary.pdf).

The RPAYC has amended its Privacy Policy in line with these new principles.

## **Definition of Personal Information**

The RPAYC 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.

## **Procedure**

### **1.0 The RPAYC**

- 1.1 The RPAYC 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. Written consent is provided
  - b. There is a legal obligation to do so
  - c. The RPAYC reasonably believes that there is a threat to an individual's life, health or safety, or public health or safety; or
  - d. The RPAYC 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 RPAYC 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 RPAYC 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 RPAYC for internal purposes to improve its service and to provide the latest information about those services and promotions to the member. The RPAYC 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 Staff may access personal information held by the club to conduct their day-to-day administrative and accounting functions on behalf of members.
- 1.6 If the RPAYC 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.
- 1.7 The RPAYC will notify members at the time, or as soon as practicable after it collects their personal information, about the access, correction and complaints processes outlined in this APP Privacy Policy.
- 1.8 The RPAYC will obtain members' consent to receive marketing/promotional information on the club by providing an 'opt-out' opportunity with any unsolicited marketing/promotional offer.

- 1.9 The RPAYC will only show email addresses individually by using the “bcc” option when sending group emails to members, other than Board and Committee emails.
- 1.10 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.
- 1.11 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.
- 1.12 Members may log in and view or alter limited personal details using their own login and passwords. Members may also view and pay their accounts securely on line.

## **2.0 Members**

- 2.1 Current Board and Rear Commodores will be supplied with the contact details of RPAYC members upon request to assist them in performing their duties.
- 2.2 The Chairman of each RPAYC Sub Committee may request Management to supply the contact details of current Members to assist them in performing their club duties. These inquiries will be directed through the Executive Assistant.
- 2.3 Requests from members for the contact details of current Board members and Rear Commodores should be directed through the Executive Assistant.
- 2.4 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.
- 2.5 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 days.
- 2.6 Members may update/correct the information held by the RPAYC by notifying the club in writing.
- 2.7 Members may request the personal details held by the club about themselves by making a written request to the general manager.
- 2.8 The RPAYC provides the option to members of dealing with them anonymously and/or provide the RPAYC 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 also available on The RPAYC website on [www.rpayc.com.au](http://www.rpayc.com.au).