

Mathoura Bowling Club  
Privacy and Data Protection Policy

1 SCOPE, OBJECTIVES AND DEFINITIONS

- 1.1 The scope this policy applies to all Personal Information used in the within the business operations of Mathoura Bowling Club and all of its organisational units (Organisational Data). This policy covers, but is not limited to, Organisational Data in any form, including print, electronic, audio-visual, and backup and archived data.
- 1.2 The objective of this policy is to provide the framework and a central point of reference for Mathoura Bowling Club Privacy and Data Protection matters. This will be achieved via supporting processes and procedures.
- 1.3 This policy should be considered within the context of the Mathoura Bowling Club overarching data governance framework which includes additional context (including Privacy Management Framework & Privacy Breach Response Procedure) for the effective management Mathoura Bowling Club's data.

2 POLICY STATEMENT

- 2.1 The Australian Privacy Principles (APPs) set out the legal requirements for the appropriate handling, management and processing of Personal Information by organisations such as Mathoura Bowling Club. This policy sets out the key principles contemplated by the APPs, however it does not represent a complete or exhaustive description of the legal requirements applicable to Mathoura Bowling Club. If you have any questions about your handling of Personal Information under the APPs, please contact Mathoura Bowling Club 's Legal Counsel for further guidance.
- 2.2 Personal Information is information or an opinion, including information or an opinion forming part of a database, whether true or not, and whether recorded in material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.
- 2.3 Sensitive Information is Personal Information which may include, but is not limited to, information or an opinion about an individual's membership of a professional or trade association, or membership of a trade union, or information about any criminal record or their health information.
- 2.4 Access to Personal Information, including Sensitive Information, should be carefully monitored so that its protection is safeguarded. Protection of Personal Information may be required for legal or ethical reasons, for reasons pertaining to personal privacy, or for proprietary considerations.
- 2.5 A consistent, repeatable and sustainable approach to the collection of, dealing with, integrity of, access to and correction of Personal Information is necessary in order to allow the Mathoura Bowling Club to meet its legal and compliance obligations.
- 2.6 Compliance with this policy is mandatory for all Mathoura Bowling Club business units.

3 POLICY PURPOSE

The purpose of the Privacy and Data Protection Policy is to:

- 3.1 ensure that the Mathoura Bowling Club manages Personal Information in an open and transparent manner;
- 3.2 ensure that the Mathoura Bowling Club takes reasonable steps to implement practices, procedures and systems to comply with the APPs and enable Mathoura Bowling Club to deal with inquiries or complaints from individuals about compliance with the APPs;
- 3.3 ensure that the Mathoura Bowling Club complies with applicable laws, regulations and standards.

4 POLICY PRINCIPLES

The following principles outline the minimum standards that guide the organisation's privacy and data protection procedures and must be adhered to by all of Mathoura Bowling Club 's staff.

Verifying the Individual

- 4.1 Mathoura Bowling Club must be satisfied that any request to access or correct Personal Information is being made by the individual concerned, or by another person authorised to make the request on their behalf (e.g. as a legal guardian or authorised agent).
- 4.2 Individuals have the option of not identifying themselves (anonymity) or using a pseudonym (pseudonymity) when dealing with Mathoura Bowling Club, except where the Mathoura Bowling Club is required by law or court order to identify the individual, or it is impractical to deal with an individual who has not identified themselves or has used a pseudonym.

Collection of Personal information

- 4.3 Mathoura Bowling Club must not collect Personal Information from individuals unless the information is reasonably necessary for, or directly related to, one or more of Mathoura Bowling Club's functions or activities.
- 4.4 Mathoura Bowling Club must not collect Sensitive Information unless the individual provides their consent to the collection of the information and collection is reasonably necessary for, or directly related to, one or more of Mathoura Bowling Club 's functions or activities.
- 4.5 Mathoura Bowling Club must only collect Personal Information by lawful and fair means. Mathoura Bowling Club must only collect Personal Information from the individual, unless he or she consents to collection from someone else.
- 4.6 Mathoura Bowling Club may receive unsolicited Personal Information and if so must determine if it could have solicited the collection of this information itself. If Mathoura Bowling Club determines it could not have collected this information, it must destroy or de-identify this information.
- 4.7 Mathoura Bowling Club must, at or before the time of collection, or if that is not practicable as soon as practicable after collection of the Personal Information, notify the individual of the following matters:
- Mathoura Bowling Club 's contact details;
  - the purposes for which Mathoura Bowling Club collects the Personal Information;
  - the main consequences for the individual if some or all of the Personal Information is not collected by Mathoura Bowling Club;
  - any other entities to which Mathoura Bowling Club may disclose the Personal Information;
  - where to find the Mathoura Bowling Club privacy policy and how to make a privacy complaint;
  - whether Mathoura Bowling Club is likely to disclose the Personal Information overseas; and
  - the countries in which those recipients are likely to be located.

Dealing with Personal Information (Authority, Use & Disclosure)

- 4.8 If Mathoura Bowling Club holds Personal Information about an individual for a particular purpose (the primary purpose), it must not use or disclose the information for another purpose (the secondary purpose) unless the individual has consented to the use or disclosure, the individual would reasonably expect the use or disclosure of the information for the secondary purpose, or use or disclosure of the information is required or authorised by law or reasonably necessary for one or more enforcement related activities.
- 4.9 If Mathoura Bowling Club uses or discloses Personal Information because it reasonably believes that the use or disclosure is necessary for one or more enforcement related activities, it must make a written note of the use or disclosure.

- 4.10 If Mathoura Bowling Club holds Personal Information about an individual, it must not use or disclose the information for the purpose of direct marketing, unless the individual would reasonably expect Mathoura Bowling Club to use or disclose Personal Information for that purpose.
- 4.11 Mathoura Bowling Club must provide individuals with a simple means by which they can easily request not to receive direct marketing communications from Mathoura Bowling Club.
- 4.12 Mathoura Bowling Club may only use or disclose Sensitive Information about an individual for direct marketing if the individual has consented to the use or disclosure of the information for that purpose.
- 4.13 If Mathoura Bowling Club discloses Personal Information about an individual to an overseas recipient (cross-border disclosure), Mathoura Bowling Club must take reasonable steps to ensure that the overseas recipient does not breach the APPs (other than APP -1).
- 4.14 Mathoura Bowling Club must not adopt, use or disclose a government related identifier of an individual as its own identifier unless it is required or authorised to do so by law.  
Integrity of Personal Information (Quality and Security)
- 4.15 Mathoura Bowling Club must take such steps (if any) that are reasonable in the circumstances to ensure that the Personal Information it collects is accurate, up-to-date and complete.
- 4.16 Mathoura Bowling Club must take such steps (if any) that are reasonable in the circumstances to ensure that the Personal Information it uses or discloses is accurate, up-to-date and complete.
- 4.17 Mathoura Bowling Club must take such steps that are reasonable in the circumstances to ensure the protection of Personal Information from misuse, interference and loss and from unauthorised access, modification or disclosure.
- 4.18 If Mathoura Bowling Club holds Personal Information about an individual and the information is no longer needed for the purpose for which it may have been used or disclosed, and it is not required to retain the information, Mathoura Bowling Club must take reasonable steps to destroy or de-identify the information.  
Access to, and Correction of Personal Information
- 4.19 If Mathoura Bowling Club holds Personal Information about an individual it must on request by the individual give the individual access to that information, unless it is required or authorised to refuse to give the individual access by law, or a valid exception is applicable.
- 4.20 Mathoura Bowling Club must respond to a request for access to Personal Information within 30 days after the request has been made, and in the manner requested by the individual, if it is reasonable and practical to do so.
- 4.21 Mathoura Bowling Club must not charge the individual for making the request and giving access to the Personal Information.
- 4.22 If Mathoura Bowling Club refuses to give access to Personal Information it must provide the individual a written notice that sets out the reasons for the refusal, the mechanisms available to complain about the refusal and other matters prescribed in the regulations.
- 4.23 If Mathoura Bowling Club holds Personal Information about an individual and the information is inaccurate, out of date, incomplete, irrelevant or misleading, or the individual requests Mathoura Bowling Club to correct the information, Mathoura Bowling Club must take reasonable steps to correct the information.
- 4.24 If Mathoura Bowling Club has corrected Personal Information, and that information has been disclosed to another entity, Mathoura Bowling Club must take reasonable steps to give notification to the third party that the information has been corrected (if requested to do so by the individual).
- 4.25 If Mathoura Bowling Club refuses to correct the Personal Information as requested by the individual, it must provide the individual a written notice that sets out the reasons for the refusal, the mechanisms available to complain about the refusal and other matters prescribed in the regulations.
- 4.26 If Mathoura Bowling Club refuses to correct the Personal Information as requested by the individual, and the individual requests that Mathoura Bowling Club to associate with the information a statement that the information is inaccurate, out of date, incomplete or misleading, it must take reasonable steps to make the statement apparent to users of the information.
- 4.27 Mathoura Bowling Club must respond to a request to correct the Personal Information within 30 days after the request has been made, and in the manner requested by the individual, if it is reasonable and practical to do so.  
Breach Notification Guidelines
- 4.28 Entities have data breach notification obligations when a data breach is likely to result in serious harm to any individual whose Personal Information is involved in the breach.