

## **TWIN TOWNS SERVICES CLUB LIMITED INCORPORATING TWIN TOWNS SERVICES PROPERTY (QLD) SHAKESPEARE AND GALAXY MOTELS.**

Twin Towns Services Club has a strong commitment to privacy and the safeguarding of the personal information it collects. We will ensure that personal information is managed in an open and transparent way. Twin Towns Property, Queensland (Shakespeare & Galaxy Motels) is bound by the provisions of the Privacy Act 1988, which governs the way private sector organisations collect, use, keep secure and disclose personal information. The Privacy Act contains 13 Australian Privacy Principles (APP's) that set standards for the handling of personal information.

### **DEFINITIONS**

**Personal information** means information we hold about you from which we can search for and retrieve your identity.

**Sensitive information** is a subset of personal information and includes, but is not limited to information about an individual's membership of a professional or trade association, membership of a trade union, criminal record or health information about an individual.

### **THE KINDS OF PERSONAL INFORMATION WE COLLECT AND HOLD**

Twin Towns Property, Queensland (Shakespeare & Galaxy Motels) will only collect and hold personal information that is necessary for one or more of its functions or activities and will collect personal information only by lawful or fair means and not in an unreasonably intrusive way.

In general, we attempt to limit the collection of sensitive information we collect from you, but we may be required to collect sensitive information from you in order to carry out the services provided to you or in the course of your employment. We will not collect sensitive information from you without your knowledge or consent.

The type of information we may collect and hold from you generally includes your name, address, date of birth, occupation, contact details including email address, phone number, transaction history, photograph and in some cases credit card and bank account details. In general, you consent to us using and disclosing your personal information to facilitate a purpose in connection with:

- For the purpose of supplying accommodation/lodging
- Recruitment and employment
- Financial details such as your tax file number if you are a staff member
- Health Information if you are an employee
- Financial management and administration.
- Meeting statutory requirements under legislation.
- Direct marketing that helps us build a stronger relationship with you.

## HOW WE COLLECT AND HOLD PERSONAL INFORMATION

Depending upon the reason for requiring the information, some of the information we ask you to provide may be identified as mandatory or voluntary. If you do not provide the mandatory information we may be unable to provide our services to you.

Personal information we collect and store is stored within our data storage devices, accessible by authorised staff and computers, and is protected by multiple layers of authentication. In certain cases, personal information may be stored on 3<sup>rd</sup> party databases. In these cases, it is encrypted in transit and authentication is required to access it, however 3<sup>rd</sup> party providers may use your personal information to market services and products to you directly independently of Twin Towns Property, Queensland (Shakespeare & Galaxy Motels) without our knowledge or consent.

## THE PURPOSES FOR WHICH WE COLLECT, HOLD, USE AND DISCLOSE PERSONAL INFORMATION

Twin Towns Property, Queensland (Shakespeare & Galaxy Motels) will collect your personal information in order to provide you with, or give you access to, a particular Towns Property Queensland (Shakespeare & Galaxy Motels) product or service. We will only use or disclose your personal information for the primary purposes for which it was collected or as consented to. In the event we propose to use or disclose such personal information other than for reasons detailed within this policy, we will first seek your consent, where it is required, prior to such disclosure or use.

Twin Towns Property & Queensland (Shakespeare & Galaxy Motels) may use the personal information we collect from you to identify particular product and service, which we believe may be of interest and benefit to you, such as from third parties. This may include such activities as competitions, policy announcements, campaigns or to hear about shows and entertainment from Twin Towns Services Club or accommodation promotions from Twin Towns Property, Queensland (Shakespeare & Galaxy Motels).

We may then contact you to let you know about these products and services. If you do not wish to receive this marketing information from Twin Towns Services Club, please let us know.

There are other situations where we are compelled by law to disclose your personal information. The Twin Towns Property, Queensland (Shakespeare & Galaxy Motels) may also use or disclose personal information:

- When it is disclosed or used for a purpose related to the primary purpose of collection detailed and you would reasonably expect your personal information to be used or disclosed for such purposes.
- To relevant authorities if it reasonably believes that there is a threat to an individual's life, health or safety, or public health or safety; or
- If we have reason to suspect that unlawful activity has been or is being, engaged in; or
- If it is required by law.

## **Is there surveillance at Twin Towns Property, Queensland (Shakespeare & Galaxy Motels)?**

All venues operated by the Twin Towns Property, Queensland (Shakespeare & Galaxy Motels) are subject to video surveillance for security reasons, including to monitor the safety of guests and employees and to protect the Motels assets. The footage may be used to investigate incidents and may be disclosed to our legal representatives, our insurers and law enforcements agencies.

### **DATA BREACH RESPONSE PLAN**

Twin Towns Property & Queensland (Shakespeare & Galaxy Motels) is committed to managing personal information in accordance with the Privacy Act 1988 (Cth) (the Act) and the Twin Towns Service Club (TTSC) Privacy Policy.

The purpose of the Twin Towns Services Club Limited Data Breach Response Plan is to set out procedures and lines of authority in the event that TTSC experiences a data breach (or suspects that a data breach has occurred). The Plan is intended to enable TTSC to contain, assess and respond to data breaches in a timely fashion and to mitigate potential harm to affected individuals.

The Privacy Amendment (Notifiable Data Breaches) Act 2017 (NDB Act) established a Notifiable Data Breaches (NDB) scheme requiring organisations covered by the Act to notify any individuals likely to be at risk of serious harm by a data breach. The Office of the Australian Information Commissioner (OAIC) must also be notified.

Accordingly, TTSC needs to be prepared to act quickly in the event of a data breach (or suspected breach) and determine whether it is likely to result in serious harm and whether it constitutes an NDB.

Adherence to the Procedure and Response Plan will ensure that TTSC can contain, assess and respond to data breaches expeditiously and mitigate potential harm to the person(s) affected.

The Procedure and Response Plan has been informed by:

- The Office of the Australian Information Commissioner's "Guide to developing a data breach response plan."
- The Office of the Australian Information Commissioner's "Data breach notification guide: a guide to handling personal information security breaches."
- NDB Act.
- The Act and Australian Privacy Principles (Schedule 1 of the Act).

### **WHO MIGHT TWIN TOWNS SERVICES CLUB & TWIN TOWNS PROPERTY QLD, DISCLOSE MY PERSONAL INFORMATION TO?**

Twin Towns Services Club & Twin Towns Property, Queensland (Shakespeare & Galaxy Motels) may disclose your personal information:

- to third party contractors and service providers who help us operate our business or provide a service to you. Twin Towns Services Club & Twin Towns Property, Queensland (Shakespeare & Galaxy Motels) may disclose your personal information to third party contractors and service providers who, for example, help us operate our computer systems, provide us with fraud prevention services, operate certain features accessible from our website, send out our mail/email and clean collected data and who perform data analysis to group demographic attributes of individuals.

Otherwise, Twin Towns Property, Queensland (Shakespeare & Galaxy Motels) will only disclose your personal information:

- where we are required to do so by law;
- if the disclosure is permitted under the Privacy Act 1988 (Cth); or
- if you have consented to the disclosure.

## ACCESS AND CORRECTION

If we have accurate personal information about you, it enables us to provide you with the best possible service. If Twin Towns Property, Queensland (Shakespeare & Galaxy Motels) holds personal information about an individual and the individual is able to establish that the information is not accurate, complete and up to date, Twin Towns Services Club will take reasonable steps to correct the Twin Towns Property, Queensland (Shakespeare & Galaxy Motels) information so that it is accurate, complete and up to date. Twin Towns Property, Queensland (Shakespeare & Galaxy Motels) will respond to a correction request within a reasonable period after the request is made.

Twin Towns Property, Queensland (Shakespeare & Galaxy Motels) will not generally refuse a request made by an individual to access their own personal information unless an exemption exists in accordance with the APP's. Written notification of reason (except where it would be unreasonable to do so in the circumstances) will be provided, if Twin Towns Property, Queensland (Shakespeare & Galaxy Motels) refuses a request and, the options for that person to make a complaint about the Clubs decision.

Contact us if you think there is something wrong with the information we hold about you and we'll try to correct it if it's:

- inaccurate;
- out of date;
- incomplete;
- irrelevant; or
- misleading.

If you are worried that we have given incorrect information to others, you can ask us to tell them about the correction. We'll try and help where we can - if we can't, then we'll let you know in writing.

## DATA QUALITY AND SECURITY

The personal information that we collect will be kept safe and secure. Twin Towns Services Club has implemented systems to ensure that personal information stored on our networks is protected by authentication log in procedures. Twin Towns Property, Queensland (Shakespeare & Galaxy Motels) runs advanced malware protection systems and will take reasonable steps to protect personal information from misuse, interference and loss, unauthorised access, modification, destruction and disclosure.

## HOW A PERSON MAY ACCESS FURTHER INFORMATION OR COMPLAIN ABOUT A BREACH OF PRIVACY

Twin Towns Services Club & Twin Towns Property Queensland (Shakespeare & Galaxy Motels) take complaints about a breach of privacy seriously. If you believe that we have breached your privacy or have any questions in relation to this Privacy Policy, you can contact the Privacy Officer on:



P.O. Box 369, TWEED HEADS, NSW 2485



+61 7 5599 0267



Compliance@twintowns.com.au



We will investigate any complaint and notify you of our decision in relation to the complaint, as soon as practicable after it is received.

## 10. AVAILABILITY OF THIS POLICY

This policy or an approved form thereof will be displayed and maintained on the Clubs Website and made available free of charge upon request.

If you require any further information, please contact the Club Administration.

Signed

Rob Smith CEO