

PRIVACY POLICY

1. Purpose

Paddo (Paddington/Woollahra R.S.L. Memorial & Community Club Co-operative Limited) is committed to providing exceptional customer service.

Paddo recognises that protecting individual's privacy and making them aware of this privacy policy is part of this commitment. Paddo provides premium hospitality and entertainment venues to its members and guests. This policy sets out the approach which Paddo takes in relation to the treatment of Personal Information.

This policy includes information on how Paddo collects, uses, discloses and keeps secure, individuals' personal information. It also sets out how Paddo makes the personal information it holds available for access to and correction by the relevant individual.

2. How Paddo collects and stores personal information

Paddo only collects and stores personal information where it is necessary to do so in order to perform one or more of its functions or activities, and in accordance with this Privacy Policy.

The types of personal information collected by Paddo include member names, date of birth, occupation, addresses and photographs.

Paddo collects information from individuals by various means including, without limitation, by individuals completing membership application or renewal forms, mailing subscriptions, entry into competitions and promotions, and via access to our website.

Paddo also scans drivers' licences belonging to guests of Paddo and operates CCTV cameras throughout our facilities.

It is necessary for Paddo to collect personal information primarily so as to ensure that individuals are supplied with tailored information about Paddo products or services.

Paddo also collects and uses personal information for the secondary purpose of:

- provision of products and services;
- accounting purposes; and
- business planning as well as product and service development.

Paddo is also required to collect and store certain member information in accordance with the Registered and Licensed Clubs Act 1976 (NSW).

Paddo will be unable to allow individuals to join the club or to be a temporary member, unless they have provided the required personal information.

3. Use of personal information

Paddo uses personal information primarily for the purposes listed above.

Where Paddo utilises direct marketing to individuals it will ensure that individuals are clearly notified of their right to opt out from further direct marketing.

Paddo will not use personal information without taking reasonable steps to ensure that the information is accurate, complete and up to date.

4. Disclosure of personal information

From time to time, Paddo may disclose personal information to related or unrelated third parties.

Paddo may disclose personal information to unrelated third parties to enable outsourcing of functions where that disclose or use is for a related secondary purpose and has been notified to individuals or where such disclose is within the individual's reasonable expectations.

Paddo will take reasonable steps to ensure that its contracts with third parties include requirements for third parties to comply with the use and disclose requirements of the Privacy Act 1988 (Cth).

In the rare event that Paddo is required to disclose personal information to law enforcement agencies, government agencies or external advisors, Paddo will only do so in accordance with the Privacy Act or any other relevant Australian legislation.

5. Information Quality

Paddo reviews, on a regular and ongoing basis, its collection and storage practices to ascertain how improvements to accuracy can be achieved.

Paddo will take steps to de-identify or destroy personal information that is no longer needed for a primary or secondary purpose after a maximum of seven years, unless the law requires otherwise.

6. Security of personal information

Access to personal information in both electronic or hard copy form is provided to a limited number of Paddo staff whose roles require access to such information.

Paddo will review, on a regular and ongoing basis, its information security practices to ascertain how compliance with its ongoing responsibilities are maintained.

7. Access and correction of personal information held by Paddo

Paddo will allow its records containing personal information to be accessed by the individual concerned in accordance with the Privacy Act.

Paddo will correct its records containing personal information as soon as practically possible, at the request of the individual concerned, in accordance with the Privacy Act.

Individuals wishing to lodge a request to access and/or correct their personal information should do so by contacting a member of the management team. Paddo will not charge any fee for accessing or processing such a request.

8. Complaints

Contact with Paddo's management team via phone or web inquiry will be the first point of contact for inquiries about privacy issues.

Any formal privacy related complaints should be directed in writing to Paddo's Chief Executive Officer.

Such correspondence will be responded to within 7 business days.

The contact details for Paddo's C.E.O. are as follows:

Chief Executive Officer

The Paddington.Woollahra Memorial And Community Club Co-Op Ltd

220 - 232 Oxford, Street, Paddington, NSW 2021

Phone 93328222 Fax 93323973

Email: admin@paddorsl.com.au

Paddo will endeavour to manage any privacy related complaint efficiently and in a timely manner.

9. Transferring personal information overseas

Paddo generally does not send personal information overseas.

However, from time to time, Paddo may send your information overseas to service providers or other third parties who operate or hold data outside Australia. Where this occurs, Paddo will make sure that appropriate data handling and security arrangements are in place. Please note that Australian law may not operate to some of these entities.