



Clublinks
Keeping you on course

Privacy Policy

March 2014

Privacy policy

In this Privacy Policy references to 'Clublinks' and the 'Clublinks Group' means the members of the Clublinks Group including Clublinks Pty Ltd ACN 103 902 996 (trading as Clublinks Business Services and Clublinks Communities), Clublinks (NSW) Pty Ltd ACN 132 745 629, Clublinks Management Pty Ltd ACN 099 690 301 (trading as Clublinks Golf Management and The Social Golf Club), Clublinks Telecommunications Pty Ltd ACN 114 234 338, Clublinks Security Pty Ltd ACN 117 662 745, ClubCom Services Pty Ltd ACN 118 724 440, ClubCom Utilities Pty Ltd and their related bodies corporate.

This Privacy Policy sets out how Clublinks collects, uses, discloses and keeps secure, individuals' personal information. It also covers how Clublinks' makes personal information it holds available for access to and correction by the individual.

This policy has been drafted having regard to Clublinks' obligations under the Privacy Amendment (Private Sector) Act 2000 (Cth), as well as, in the case of Clublinks Telecommunications Pty Ltd, the Telecommunications Act 1997(Cth).

Clublinks has developed its Privacy Policy to ensure that all data and images collected and stored by or on behalf of the Clublinks Group is done so in a responsible manner. Clublinks wishes to ensure that individuals are made aware of when information about them is being collected, the purpose for which it is being collected, whether the information may be passed on to third parties and the identity of those parties and the rights of individuals to have some control over the way any information about them is handled and maintained.

Employees and consultants engaged by Clublinks are expected to adhere to our Privacy Policy. Those employees and consultants who have access to customer information will have copies of our Privacy Policy and the contact details of the Clublinks Privacy Officer.

We may also obtain information about customers from third parties to identify those persons we think will be interested in specific aspects of Clublinks' businesses. We use this information to offer these individuals further details of facilities and services offered by the Clublinks Group.

Because we strongly advocate the protection of all individuals' details and personal information, we believe that the adoption and implementation of our Privacy Policy represents good business practice and will assist us in serving your best interests.

This Privacy Policy guides our conduct in the collection, use, release and security of customer information.

This Privacy Policy has also been developed to adhere to the Australian Privacy Principles (APPs). If you have any comments or questions about our Privacy Policy, please contact our Privacy Officer. For more information about the Privacy Commissioner's guidelines, call the Privacy Hotline on 133 363 992 (local call charge) or visit www.privacy.gov.au.

How and why we collect personal information

We only collect customer information that is needed, and we inform customers how we use it. Most of the personal information we hold has been provided directly to us by our customers for a specific purpose. We limit the collection of information about our customers to information which is required to provide our services, answer their queries, to provide better information, to offer new updates on aspects of Clublinks' businesses, and to fulfill any legal and regulatory requirements.

The Clublinks Group collects personal information primarily to comply with obligations to provide services to customers of the Clublinks Group. The Clublinks Group also collects and uses personal information for secondary purposes including:

- (i) billing and account management;
- (ii) business planning and product development; and
- (iii) to provide individuals with information about the Clublinks Group.

We may collect certain information from third parties

We may also obtain information about prospective customers from our staff or other third parties to identify those persons whom we think will be interested in specific aspects of the Clublinks. We use this information to offer these individuals further details of facilities and services available from Clublinks. We may collect certain information for statistical purposes when you browse our Internet site.

Information we may collect about you

The information we collect about you depends on which products and services of ours you subscribe to. It may include:

- your name, date of birth, contact details including your physical address, email address and telephone number;
- information to verify your identity such as your driver's licence number (or other approved government ID);
- information relating to your credit worthiness;
- your membership details;
- your golf handicap;
- your bank account and credit card details;
- your payment history with us;
- your contracts with us and services we have provided to you;
- websites you visit and your use of telecommunications and data;
- any additional information relating you provide to us directly;
- your employment-related information if you apply for a position with us; and
- information you provide to us through customer surveys.

If you are only browsing our Internet site, we do not collect personal information -such as your name, address, phone number or E-mail address. However, technology allows us to identify your movements, providing us with constructive feedback about our site so that we can identify the most effective areas and improve the less popular ones. This is done via what is more commonly referred to as "cookies", which are files that

track the Internet pages you have visited but which, by themselves, cannot be used to find out the identity of any user. The only personal information cookies contain, is information you provide yourself.

We do not collect sensitive information

Clublinks does not require or collect information about a person that is considered sensitive under the Privacy Amendment (Private Sector) Act 2000 (Cth). Such information includes a person's political, social or religious beliefs or affiliations; race, ethnic origin or national origins; sexual preferences or practices; health or medical information; character or reputation.

We do not disclose your personal information overseas

Clublinks does not disclose any personal information collected in Australia to any person overseas.

How we use personal information

Use of information for primary purpose - Clublinks collects personal information primarily to supply customers with the products and services ordered from the Clublinks Group and for billing and account management purposes.

We use personal information primarily for the purpose for which it was collected. Because most of our information is collected from you for a specific purpose, you will normally be aware of the purpose of the collection.

Use of information for a secondary purpose - providing you with a better level of service. We may share information about you so that we can provide a better level of service to members and residents. For example, if you change address we may pass this information on to provide you with the best level of information and detail about Clublinks' services. However, we will only do this in the following circumstances:

- where you have consented;
- when you would reasonably expect us to use or disclose the information in such a way;
- as we are permitted or required by law; or
- it is in the interests of public safety to do so.

In some cases, we have entered into service contracts with other companies, and may need to disclose your personal information to those companies. Examples of this include trust account administrators, telecommunications, security and technology service providers.. We provide these bodies only with such information about you as they need to perform their services. We expect the companies we select as our business partners to honour our privacy principles in the handling of customer information.

We may also disclose your information:

- to your authorised representatives or advisers, or when you ask us to do so;
- to credit-reporting bodies and fraud-checking agencies, and to credit providers for credit related purposes such as credit-worthiness, credit rating, credit provision and financing;
- to our third party service providers;
- to any organisations as required or authorised by law
- to law enforcement and national security agencies; or
- to other government and regulatory authorities as required or authorised by law.

Use of information provided via our web site - If you would like to register for information via our Internet site, we will need you to provide us with some personal information, including your E-mail address. We only collect information about you, which is required to process your request, and also to satisfy any legal requirements. If you are a registered user of certain elements of the Clublinks' website, we will use the online and offline information we have about you as a registrant, as well as information lawfully available from other organisations, to provide information and services as required in our normal course of business.

Opting out

If you have provided personal information for the purpose of receiving updates from Clublinks via email, you can decide at any time that you no longer wish to receive any such information.

It may take up to 2 to 3 weeks for your request to become effective. If you do not want to receive emails from Clublinks, please notify our office.

This entitlement to "opt out" of receiving information extends beyond email correspondence. On a regular basis, we give our customers the option to decide whether or not they wish to have their names removed from lists used for mail, telephone and online marketing. Also, if you request information about one aspect of the Clublinks Group specifically and not another, for example telecommunications but not security services, then we will endeavour to comply with your request..

How we ensure the quality and accuracy of personal information

We ensure that customer data is processed promptly, accurately and completely. If you consent to our collecting, storing and using certain personal information, we will retain your personal information for a reasonable period of time.

We provide methods for you to access and correct your information

Part of our commitment to the quality and accuracy of any personal information we store, is reflected in the fact that you have the opportunity to access your personal information in order to verify that it is up to date. You can contact our Privacy Officer at any time if you would like details of any personal information we may hold about you or if you would like us to correct it. Depending on the nature of your request, we may ask you to complete a personal data access form, and to provide adequate proof of identification.

Our right to refuse access or correction

We reserve our right to refuse your request for access or correction if, for example, we consider your request to be incorrect, frivolous or vexatious, or if we are legally entitled to do so. If we refuse your request, we will give you our reasons.

How we protect the information collected

Access to customer data is limited to those employees and contractors who specifically need it to carry out their business responsibilities. This extends to protecting personal information from misuse and loss, as well as from modification and disclosure.

We may store your information in hard copy or electronic format, or both. We may store it in our own facilities or those that are owned and operated by our service providers. We take reasonable steps to maintain the security of your information and to protect it from unauthorised disclosures.

Children, customer information and our internet site

We do not use www.clublinks.com.au to knowingly solicit information from or market to children or young persons under the age of 18.

Clublinks Security Pty Ltd

Clublinks Security Pty Ltd is a registered and licensed private security business operating in New South Wales and Victoria. In the course of providing security services Clublinks Security may collect images of individuals on its CCTV and other security equipment. Clublinks Security complies with its obligations as a licensed security business in the collection, storage and use of these images, including the Surveillance Devices Act 1999 (Vic) and the Workplace Surveillance Act 2005 (NSW).

Clublinks Security's collection, storage and use of any images collected and retained on its CCTV system is for the primary purposes of:

1. providing security services to its customers in the detection, prevention or reduction of the incidence of property crime and offences against individuals;
2. reducing theft of cars and theft from cars both on streets and in car parks;
3. providing general security monitoring, both in terms of personal security and security of premises; and
4. providing emergency service assistance.

Where appropriate, the Australian Federal Police will be asked to investigate any matter recorded by the CCTV system which is deemed to be of a criminal nature

Customer information and linked internet sites

www.clublinks.com.au contains links to other Internet sites. Clublinks is not responsible for the content and the privacy practices of these other internet sites. Clublinks encourages you to examine each site's privacy policies and for you to make your own decisions regarding the reliability and correctness of the material and information found.

Changes to our privacy policy

Clublinks reserves the right to revise this Policy at any time and those people who volunteer their personal details to us are deemed to acknowledge and be bound by this policy and any changes made to it. This in no way affects the protection afforded to you by the relevant laws according to which this Privacy Policy was developed.

How to contact us

If you have any other questions about this Privacy Policy or if you are concerned we may in be in breach of our obligations to you, please contact us at the following address:

Clublinks Privacy Officer
Clublinks Pty Ltd
PGA National Office
600 Thompson Road
Sandhurst VIC 3977
Australia

We will endeavour to respond to your letter within 14 days of receipt by us. If you are not satisfied with our response please feel free to let us know, or you may wish to contact the Australian Information Commissioner