

# Privacy Policy

In this Privacy Policy references to 'Clublinks' means the members of the Clublinks group of companies, including Clublinks Pty Ltd ACN 103 902 996, Clublinks (NSW) Pty Ltd ACN 132 745 629 and Clublinks Management Pty Ltd ACN 099 690 301 as well as their related bodies corporate.

## Overview

This Privacy Policy sets out how Clublinks handles your personal information and has been developed to comply with the Australian Privacy Principles (APPs). This policy has been drafted having regard to Clublinks' obligations under the Privacy Act 1988 (Cth) and the Privacy Amendment (Private Sector) Act 2000 (Cth).

Clublinks takes steps to ensure that all personal information collected, used and stored by or on behalf of Clublinks is done so in a responsible manner and as permitted by law. This Privacy Policy guides our conduct in the collection, use, release and security of your personal information.

Employees and consultants engaged by Clublinks are expected to adhere to our Privacy Policy.

## COLLECTION OF YOUR PERSONAL INFORMATION

We try to only collect personal information that we need to provide our services. We collect and use personal information primarily to provide our services and comply with our obligations to our customers, to offer information about various aspects of Clublinks' business, and to fulfil our legal and regulatory requirements.

Most of the personal information we collect and hold has been provided to us by our customers. The information we collect about you may include:

- your name, date of birth and contact details;
- information to verify your identity such as your driver's license number;
- information relating to your credit worthiness;
- your bank account, credit card details and your payment history with us;
- your arrangements with us and services we provide or have provided to you;
- owners' corporation details if we are providing relevant OC management services;
- any additional information you provide to us such as your membership details;
- related information if you hold or apply for a position with us.

As a manager and operator of leisure facilities including gyms and health clubs, Clublinks will also collect and use certain health information as provided to us relating to your use and membership of the relevant leisure facility.

Clublinks does not require or collect information about a person that is considered sensitive and which relates to includes a person's political, social or religious beliefs or affiliations, race, ethnic origin or national origins, sexual preferences or practices, or genetic or biometric information.

We may also obtain information about customers from their authorised representatives or from third parties. We may use this information to comply with our legal obligations or offer individuals further details of facilities and services offered by Clublinks.

If you do provide us with your personal information and you wish to limit our collection, use and disclosure of personal information, we ask that you expressly state those limitations in writing to us.

## **INFORMATION COLLECTED THROUGH OUR WEBSITES**

If you are only browsing our website, we do not collect personal information such as your name, or contact details. However, technology allows us to log a record of your visit, identify certain information such as your IP address, the type of browser you are using, your operating system, pages accessed, and in order to improve our websites and respond to requirements. We also use "cookies", which are files that identify your computer and 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 use the internet to knowingly solicit information from or market to children or young persons under the age of 18.

We collect information that you provide to us when signing up to mailing lists, using electronic forms or registering with us. We may also use social networking sites such as Facebook or Instagram to communicate with you. These social networking sites have their own privacy policies. Where our website contains links to these or other sites, Clublinks is not responsible for the content and the privacy practices of these other sites. We encourage 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.

# HOW WE USE & DISCLOSE YOUR PERSONAL INFORMATION

Clublinks collects personal information primarily to supply customers with various products and services and for billing and account management purposes. Because most information is collected from you for a specific purpose, you will normally be aware of the purpose of the collection.

We may use your personal information in order to provide a better level of service and to provide you with additional detail about our business.

In some cases, we have entered into service contracts with other businesses, and may need to disclose your personal information to those companies. Examples of this include account administrators, telecommunications, security and technology service providers. We provide these businesses 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 personal 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.

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

If you have provided us with access to your personal information through our websites, we will use the 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. If you do not want to receive emails from Clublinks, please notify our office. It may take up to 2 to 3 weeks for your request to become effective.

Your 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.

## QUALITY AND ACCURACY OF PERSONAL INFORMATION

We endeavour to ensure that customer data is processed promptly, accurately and completely.

If you consent to our collecting, storing and using your personal information, we will retain your personal information for a reasonable period of time.

You may 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.

If we refuse to give you access to, or correct, your personal information (for example, if we consider your request to be incorrect, frivolous or vexatious, or if we are legally entitled to do so) we will give you our reasons in writing.

## HOW WE PROTECT PERSONAL INFORMATION

We take reasonable steps to maintain the security of your information and to protect it from unauthorised disclosure.

Access to personal information 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 or facility owners.

If we become aware that your personal information is lost or is accessed or disclosed without authorisation, we will notify you as well as the Office of the Australian Information Commissioner ("OAIC") where that data breach is likely to result in serious harm.

## CHANGES TO OUR PRIVACY POLICY

From time to time Clublinks will update or replace this Privacy Policy to reflect changes in its legal obligations or its business practices. Where Clublinks does so, it will post a new or updated version of this Privacy Policy on the relevant internet site. This in no way affects the protection afforded to you under the Privacy Act 1988 (Cth) or the APPs.

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

**Clublinks Privacy Officer**

Clublinks Pty Ltd  
Waterman Business Centre  
Suite 001, 44 Lakeview Drive  
Scoresby VIC 3179  
Australia

We will endeavour to respond to your letter within 30 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 OAIC. <https://www.oaic.gov.au/about-us/contact-us/>

**April 2023**