





# 1. Introduction

## 1.1 Overview

Lord's Taverners ACT (LT ACT or the Association) is committed to protecting personal information that it collects, stores and administers.

## 1.2 Purpose

The purpose of this document is to provide a framework for dealing with privacy considerations.

## 1.3 Applicability

The policy and procedures outlined in this document apply to all officers and members of LT ACT.

## 1.4 Legislative/Regulatory Requirements

- *Privacy Act 1988 (Cth)*, including the Australian Privacy Principles (APPs)

Relevant state and territory legislation may also apply.

## 1.5 Definitions

**Officer of the Association** A LT ACT Committee member or a volunteer acting on the Association's behalf.

**Personal Information** Information that directly or indirectly identifies a person.



## 2. Policy Statement

LT ACT collects, stores and administers a range of personal information for the purpose of providing member services and is committed to protecting such information.

LT ACT recognises the right of its members and other stakeholders to have their personal information protected and made accessible to them.

LT ACT is not formally bound by the *Privacy Act 1988 (Cth)* since our annual turnover is below the applicable threshold.<sup>1</sup> Nevertheless, we will make every effort to comply with the intent of the *Act*, including the Australian Privacy Principles.

## 3. Responsibilities

The Committee is responsible for ensuring that an appropriate privacy policy is in place and appropriate compliance.

All LT ACT officers are responsible for managing the privacy of stakeholders in accordance with this policy.

## 4. Procedures

### 4.1 Collection

LT ACT collects personal information about individuals including its members and other stakeholders.

LT ACT will only collect personal information that is reasonably necessary for the performance of its services as a not-for-profit association. For most members, this information will include an individual's title, names, residential and/or postal address, email address, and telephone numbers.

For contractors, suppliers and officers of LT ACT, we may also collect information about work history, referees and any other information submitted in a job application, a contract bid or as part of a fit and proper person check.

LT ACT will usually collect a member's personal information directly from the member and with the member's explicit consent, either through a membership application or updates provided by the member. We will only collect a member's personal information from someone else if we have the member's consent in writing, or if it is authorised or required by law, or if it is unreasonable or impractical for us to collect that information from the member (for example,

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<sup>1</sup> <https://www.oaic.gov.au/privacy-law/privacy-act/australian-privacy-principles>



when a family member advises us of an infirm member's change of address/circumstances).

## 4.2 Use and Disclosure

LT ACT will only use or disclose personal information for the primary purposes for which it was collected or directly related secondary purposes that the individual concerned would reasonably expect (or that we have advised) or as permitted or required by law. If there is any doubt about this expectation, we will obtain the individual's consent in writing before using or disclosing the information for a secondary purpose.

Officers of LT ACT with access to Association databases must be cognisant of their responsibility to protect stakeholder information.

The purposes for which we may use or disclose personal information include:

### 1. Provision of member services:

LT ACT uses personal information for the primary purpose of providing member services. Some personal information may be shared with Taverners Australia for the purpose of generating national level statistics or for promotional purposes.

### 2. Contractors and suppliers:

LT ACT may collect personal information about contractors and suppliers that provide services to the Association for the primary purpose of assessing and engaging their services or expertise and for other purposes where legally required.

### 3. LT ACT website:

When a stakeholder visits our website, we do not attempt to identify that individual or store his/her personal information. We will only collect and store an individual's personal information if he/she chooses to provide it via an online form or by email, for example through a 'Contact' page.

We note that our website provider makes a record of each visit to our website and logs your information for statistical purposes. This information is only used to evaluate the effectiveness of our website but, in the event of an investigation, a law enforcement agency or other government agency may exercise its authority to inspect the logs maintained by our website provider.

Our website uses temporary cookies for security purposes. The cookies do not identify the individual user, but do identify the internet services provider and browser type. This means we do not store any personal information from visitors to our website.



Our website contains links to websites of third parties. We are not responsible for the privacy policies or practices of such third party websites.

### 4.3 Storage

LT ACT may store personal information in electronic systems, paper files or images.

All information we collect will be stored securely. We will:

- take steps to protect the personal information we hold against interference, misuse, loss and unauthorised access; and
- before disclosing any personal information to an overseas recipient, including a provider of information technology services such as servers or cloud services, establish that they are compliant with our privacy policy and the APPs.

When personal information is no longer required, it will be destroyed, deleted or de-identified securely.

### 4.4 Data Quality

LT ACT will take reasonable steps to ensure that the personal information we collect and hold is accurate, complete and up to date. We maintain and update the personal information we hold as necessary or when stakeholders advise us that their personal information has changed.

### 4.5 Access and Correction

Stakeholders who wish to access or amend their personal information should make a request in writing to the Secretary. Requests may be made by post, email or online form.

We will respond to requests for access or amendment within five (5) working days. We will provide access or make the correction requested unless otherwise required or where we are permitted by law to withhold the information or not make the amendment. We will notify the individual of the basis for any denial of access or amendment to personal information.

Where we allow access, the relevant LT ACT officer will arrange to give the stakeholder access in the manner requested if it is reasonable or practical to do so. The manner of access may be by email, phone, in person, hard copy or by electronic means.

If we agree that the personal information requires correction or amendment, the relevant LT ACT officer will make the alterations or notation. If we do not believe an amendment is necessary, the stakeholder may insert an addendum into the record.



## 4.6 Complaints

Stakeholders who have concerns about their privacy or wish to make a complaint about a privacy breach should contact the Secretary.

The complaint must be made in writing and should provide sufficient details of the complaint together with any supporting material.

On receipt of a complaint, LT ACT will take steps to investigate and advise the complainant of the outcome. The relevant LT ACT officer may contact the complainant by telephone or arrange to meet personally. Alternatively, we may respond in writing depending on the complexity and nature of the matters in dispute. We will endeavour to respond to complaints within a reasonable period.

If a stakeholder is not satisfied with our response, we can be contacted to discuss the matter further. Alternatively, the stakeholder can complain to the Office of the Australian Information Commissioner (Cth) via the website: [www.oaic.gov.au](http://www.oaic.gov.au).

## 5. Related Documents

This Policy is to be read in conjunction with the Constitution of Lord's Taverners ACT.