



Club Managers Association of Australia Privacy Policy

Introduction

The Club Managers Association of Australia (**Association**) is the Association representing Managers in the Hospitality Industry in Australia. The Association collects personal information in order to conduct its business of Membership, Industrial Relations support, conferencing, supplier relationships, Vocational Education and Industry Professional Development activities. The Association operates in the political, legal, industrial, education, and social spheres.

The Association is committed to protecting your privacy and providing you with information and services relevant to you. The Association complies with the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**). This Privacy Policy (**Policy**) should be read in conjunction with the Privacy Act and the APPs.

In this Policy, the Association includes its' registered training organisation (**the RTO**)

How this Policy applies

This Policy applies to personal information the Association collects from you:

- via one of our websites;
- via social media;
- via telephone;
- via email;
- via fax;
- in person; and/or
- in writing.
- via one of our third party events providers.

This Policy also applies to personal information the Association collects from the Australian Council of Trade Associations (**ACTU**) or any other third party, about you.

Association website(s)

The Association and RTO website(s) collect two types of information. The first type is anonymous information. The web server makes a record of your visit and logs the following information for statistical purposes:

- the user's server address;
- the user's top level domain name (e.g. com, .gov, .net, .au, etc.);
- the date and time of the visit to the site;
- the pages accessed and documents downloaded;
- the previous site visited; and
- the type of browser used.

No attempt will be made to identify users or their browsing activities except, in the unlikely event of an investigation, where a law enforcement agency may exercise a warrant to inspect the internet service provider's logs.

Another way information may be collected is through the use of "cookies". A cookie is a small text file that the website may place on your computer. Cookies may be used, among other things, to track the pages you have visited, to remember your preferences and to store personal information about you.

The Association website uses cookies for “Session Management” to maintain data related to the user during navigation to make it easier for you when logging in to register for courses or update Membership data.

The Association and RTO website DOES NOT use Cookies for user tracking.

You can adjust your Internet browser to disable cookies or to warn you when cookies are being used. However, if you disable cookies, you may not be able to access certain areas of the Website or take advantage of the improved web site experience that cookies offer.

Our websites may contain links to other websites, web based third party event booking facilities, and social media pages including Facebook, Twitter and LinkedIn or Youtube. We are not responsible for the privacy policies of the entities responsible for those websites and we recommend that you review the privacy policies applicable to any other websites you visit.

Our website also requires you to provide information to register and pay for education and professional development activities. This also includes details for invoicing and for credit card payment where applicable. The Association does not store credit card details.

The kinds of information the Association may collect

From time to time you may voluntarily supply your personal information to the Association. The Association will record your e-mail address if you send us a message, subscribe to an email newsletter, or complete a form if this information is requested.

When you provide your personal information, it allows us, for example, assist you with industrial relations and employment queries, inform you about industrial, social and political campaigns, and accept your application for membership, and registration for educational and professional activities. You may supply personal information to the Association and the RTO by, for example, responding to a survey, filling in a meeting attendance sheet, taking part in a competition, completing a membership or course registration form (via website or in person), discussing your issues with a delegate, or signing up to a campaign. The Association only collects personal information that is necessary for the Association and the RTO to perform its functions and/or activities.

Depending upon the circumstances you may provide to the Association and RTO, and the Association and RTO may collect, information such as, but not limited to:

- your name;
- your contact details;
- your social media details (e.g. blogs, twitter, Facebook, LinkedIn);
- your gender;
- your marital status;
- your employment details;
- your educational qualifications; and
- your inquiry or complaint details.
- your feedback or evaluations of education, professional development, or any other service that the Association provides

Some personal information is considered sensitive information and includes:

- your Association membership (if any);
- your racial or ethnic origin;
- language spoken at home;
- reasons for study;
- your sexual orientation;
- any disabilities, illnesses or injuries you may have; and/or
- any other health information.

The Privacy Act allows the Association and the RTO to collect sensitive information which relates solely to Association members or people who have regular contact with the Association or RTO if the sensitive information relates to the Association’s or RTO’s

activities. We will only collect sensitive information where we have received your consent to your personal information being collected, used, disclosed and stored by the Association or RTO in accordance with this Policy.

Where proof of identity is required for Association Membership or RTO course enrolment, we may request photographic proof of identity in the form of State (other nationally issued) Driver's License; Australian or other nationally issued passport, or Australian state issued Proof of Age or identity card.

Where you provide information to the Association in relation to a job application the personal information you provide will only be collected, held, used and disclosed for the purposes of considering your potential employment with the Association. Where you provide the details of referees, you confirm that you have informed the referees that you are providing their contact information to the Association and they have consented to the Association contacting them and discussing the personal information you have provided in relation to the job application.

We will collect personal information directly from you:

- unless you have consented to the Association's collection of your personal information from third parties - for example, from the ACTU, or your representatives; or
- when we are legally required to do so; or
- unless it is unreasonable or impractical to do so.

Where we have collected personal information about you either directly or by other means as set out above, we will notify you at the time, or as soon as practicable, to ensure that you are aware of such collection and its purpose.

You can choose to interact with us anonymously or by using a pseudonym where it is lawful and practicable. For example, you may wish to participate in a blog or enquire about a particular campaign anonymously or under a pseudonym. Your decision to interact anonymously or by using a pseudonym may affect the level of services we can offer you. For example, we may not be able to assist you with a specific industrial enquiry or investigate a privacy complaint or provide accredited education products and services on an anonymous or pseudonymous basis. We will inform you if this is the case and let you know the options available to you.

If we receive unsolicited personal information about or relating to you and we determine that such information could have been collected in the same manner if we had solicited the information, then we will treat it in the same way as solicited personal information and in accordance with the APPs. Otherwise if we determine that such information could not have been collected in the same manner as solicited personal information, and that information is not contained in a Commonwealth record, we will, if it is lawful and reasonable to do so, destroy the information or de-identify the information.

The purposes for which personal information is collected, held, used and disclosed

The Association and the RTO collects, holds, uses and discloses your personal information to:

- assist you with industrial relations and employment queries;
- inform you about industrial, social and political campaigns;
- inform you of issues directly relating to your industry;
- inform you about your rights at work;
- inform you about changes to legislation;
- refer you to a legal practitioner, accountant or other professional;
- improve our service delivery;
- manage our relationship with you;
- conduct surveys and research;
- provide educational services and professional development;
- conduct Association elections;
- allocate industry activity points for Members of the Association
- to fulfil statutory reporting obligations relating to Federal education bodies

Using your information for direct marketing

You consent to our use and disclosure of your personal information for the purposes of direct marketing which may include providing you with information about events, products or services, and courses which may be of interest to you.

If you do not want us to use your personal information for direct marketing purposes, you may elect not to receive direct marketing at the time of providing your personal information.

Unsubscribing and opting out

If you no longer wish to receive direct marketing or other communications, you may request at any time to cancel your consent to such communications as follows:

- If subscribing to an email newsletter you may "unsubscribe" at any time from the newsletter mailing list;
- The Association and RTO may, from time to time, send you text messages about issues of importance such as events or campaigns. You may "opt out" by texting STOP in reply to a text message from the Association; or
- You may contact us at any time by mail or email directed to the Association's Executive Officer who is the Privacy Officer.

Disclosure of your personal information

The Association and RTO may disclose your personal information, in connection with or to further the purposes outlined above, to:

- the ACTU;
- other Australian trade Associations;
- affiliated trades halls or labour councils;
- political parties;
- government bodies or agencies (including the Fair Work Commission, the Fair Work Ombudsman, the Australian Tax Office, an anti-discrimination body, a work/occupational health and safety regulator, Australian Skills Qualification Authority [ASQA]);
- third parties to validate or verify education related qualification or status enquiries.
- organisations to whom we outsource functions (including information technology providers, print service providers, mail houses);
- facilitate organisation of Education or professional development events and activities in partnership with third parties.
- otherwise as you have consented; and/or
- otherwise as required by law.

If any of these organisations are located outside Australia, you expressly consent to us disclosing your personal information to those organisations. These parties may be located in the following countries: Nil

We take reasonable steps to ensure that each organisation that we disclose your personal information to is committed to protecting your privacy and complies with the Australian Privacy Principles, or is subject to a law or scheme that is at least substantially similar to the way in which the Australian Privacy Principles protect information.

By providing your personal information to the Association and the RTO, you consent to us transferring your personal information to such other organisations.

How the Association and RTO holds personal information

Wherever reasonably practicable the Association and RTO holds electronic personal information on data servers that are owned and controlled by the Association and RTO in Australia. The data servers are password protected and login secured, and back up copies are maintained offsite by contracted IT service provider(s). The RTO also retains hard copy personal records in secured filing rooms to meet Australian educational record keeping laws. However, by providing personal information to the Association and RTO you consent to your information being stored in and processed on a secure web based application on a data server or data servers (e.g. cloud services) owned by a third party or third parties that may be located within or outside of Australia – this is not regarded as a disclosure. The Association will take reasonable steps to ensure that any third party providers comply with

the APPs. In the future, if personal information is only routed through servers located outside of Australia – this not regarded as a disclosure, and the Association’s Privacy Policy will be amended where appropriate to satisfy the APPs.

Wherever reasonably practicable the Association and RTO holds physical personal information in access controlled premises.

When the Association no longer requires your personal information for a specific purpose and we are not required to keep it to comply with any laws, we will take such steps as are reasonable in the circumstances to destroy your personal information or to ensure that the information is de-identified.

Government Identifiers

The Association will not adopt as our own identifier a government related identifier of an individual, such as a tax file number or Medicare card number and will only use or disclose a government related identifier where the use or disclosure:

- is reasonably necessary for the Association to verify your identity for the purposes of our activities or functions;
- is reasonably necessary for the Association to fulfil its obligations to an agency or a State or Territory authority;
- is required or authorised by or under an Australian law; or
- is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

The RTO will adopt as our own identifier a government related identifier of an individual student to fulfil its regulatory obligation to adopt the Unique Student Identifier number register for all nationally accredited course enrolments in Australia.

How you may seek access and/or correction to personal information held by the Association

You have the right to request access to your personal information and request that it be updated or corrected. In most cases you can gain access to your personal information that the Association and RTO holds. To request access to, correction of, or updating of any personal information held about you, please write to the Privacy Officer at the following address:

The Privacy Officer and Executive Officer
CMAA
PO Box 4317
Sydney Olympic Park, NSW 2127
E: cmaa@cmaa.asn.au

General enquiries can be made via telephone by calling the following number:

P: 02 9746 4199

The Association and RTO requires that you provide acceptable photographic proof of identity in order to seek access to your personal information (Drivers License, Passport, or State based proof of age card). The Association and RTO may charge a reasonable fee where access is provided. The Association and RTO may refuse to provide access if permitted to do so by law or under the APPs. The Association and RTO will seek to provide you with access to your personal information within 30 days of receipt of a valid request and may charge you a reasonable fee for doing so.

You should contact the Association and RTO when your personal information details change. It is important that we keep our membership and student records details up to date. Please contact Membership or an RTO employee to update any personal information. The Association and RTO may also take steps to update your personal information by reference to publicly available sources such as telephone directories or electoral rolls.

Membership can be contacted at the following address:

cmaa@cmaa.asn.au

How you may complain about a breach of the APPs

To make a complaint about an alleged breach of the APPs please write to or email the Privacy Officer at one of the following addresses:

The Privacy Officer and Executive Officer
CMAA
PO Box 4317
Sydney Olympic Park, NSW 2127
E: cmaa@cmaa.asn.au

All complaints must be written. Please provide all details about your complaint as well as any supporting documentation to the Privacy Officer.

How the Association will deal with complaints

The Association will seek to deal with privacy complaints as follows:

- complaints will be treated seriously;
- complaints will be dealt with promptly;
- complaints will be dealt with confidentially;
- complaints will be investigated by the Privacy Officer; and

the outcome of an investigation will be provided to the complainant where the complainant has provided proof of identity. The Association will seek to respond within 30 days of receipt of a valid complaint.

Variations to the Policy

The Association will occasionally update this Privacy Policy to reflect Association and customer feedback and or legal requirements. The Association encourages you to periodically review this Policy on our website(s) to be informed of how the Association is protecting your information.