



## **APPENDIX A**

**ANARE CLUB Inc.  
Reg. No. A0014480G(Vic)**

### **The ANARE CLUB PRIVACY POLICY**

#### **DOCUMENT**

**27 July 2023**

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**The ANARE CLUB Inc. recognises that it has important privacy obligations under the Commonwealth and Victorian Privacy Acts regarding the management of its Membership Data Base.**

**The following Privacy Document sets out to codify the Club's responsibilities in managing Members personal information provided and entrusted to the ANARE Club.**

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## 1. Introduction.

As an entity registered an incorporated body in the State of Victoria. the ANARE Club is bound by the Information Privacy Principles (IPPs) as set out in the *Victorian Privacy and Data Protection Act 2014 (2022)*. The obligations of these IPPs extend to the Club's Office Bearers, National Council Members and State/Territory Branches appointed members and to any member of the Club authorised to use the Club's Membership Data Base or who is in any way involved in the recording, use, dissemination of this information.

The Victorian Act regulates how the Club collects, uses, stores and discloses personal information, including sensitive information, and how individuals may access and correct their personal information held about them.

Accordingly, the Club manages your personal information, by adopting good privacy practices across all aspects of its functions and activities and by taking proactive steps to identify and manage privacy risks in an open and transparent manner.

You can learn more about the Victoria Privacy and Data Protection Act 2014 and the IPPs etc on the website of the [Office of the Victorian Information Commissioner \(OVIC\)](https://www.ovic.vic.gov.au) at <https://www.ovic.vic.gov.au>

The following detailed Statements discuss how the Club deals with your personal information which you entrust to us as a member of the ANARE Club,

If you are seeking a summary (short-hand )overview of the Club's personal information management practices, please see the Summary of the Club's Privacy Policy available on our Club website.

Both Club Privacy Policies are reviewed and updated annually. Any updated versions will be available on the Club Website as they fall due.

### 1.1 The Club's Measures in handling Member's Personal information

In handling personal information, the Club is aligned with the **IPPs**. and it will only collect your personal information where this is reasonably necessary to do so, for, or directly related to your membership of the Club, and/or one or more of its functions or activities related to the purposes of the Club's Constitution or Rules.

Furthermore, the Club;

- (a) will only use and disclose your personal information for the purposes for which it was collected, or otherwise in accordance with the Victorian Privacy Act 2014(2022) and
- (b) will notify you of the purpose that your personal information is being collected, either at the time of collection, or as soon as practicable thereafter.

### 1.2 What is Personal information

In this Privacy Policy, the term **"personal information"** has the meaning given to it in the Privacy Act 2014 (Vic) "Personal information" is any information or opinion about an identified individual, or an individual that is reasonably identifiable. The information or opinion does not have to be true or recorded in a material form.

### 1.3 What is Sensitive Personal Information., which the Club does NOT collect.

‘Sensitive information’ which is a subset of personal information and generally has a higher level of privacy protection than other personal information, is **NOT** collected by the Club.

Sensitive information is personal information that contains information or an opinion about an individual’s: racial or ethnic origin; political opinion or association; religious beliefs or affiliations; philosophical beliefs; trade or professional associations and memberships; union membership; sexual orientation or practice; criminal record; health or genetic information.

### 1.4 Collection of Business information

While Business information does not generally fall within the definition of “personal information” under the Privacy Act, but it may do so where the information relates to partnerships. Where business information contains personal information, this Privacy Policy will apply to the personal information component.

## 2. Personal information collected by the Club

### 2.1 Categories of personal information

The Club collects and holds different categories of personal information to undertake its functions and activities, these include:

- (a) **Who you are:** Your Title, Name (Christian names / Surname), Age & Birth Date (Optional);  
Photographs (Optional); videos, audio-visual recordings, referee details;
- (b) **Your Contact details:** Your postal mailing and/or street address. telephone and/or mobile number and email address;
- (c) **Information about the Club products and services** you have purchased or enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries
- (d) **Other types of personal information** as may be required to be collected for the purposes of the Club’s functions and activities.
- (e) **Online information including information** posted by you on our websites and social media platforms, cookie and clickstream data (this can be disabled by you), and publicly available information posted on other websites or platforms.
- (f) **The sources (providers) through which you make payments** of your annual membership subscriptions or make purchase transactions for Club merchandise for internal accounting purposes only.

## 3. How the Club collects and holds your personal information

### 3.1 Information collected from you

The Club will generally collect personal information described in 2.1 above directly from you as per its Membership Application form.

However, this may include information provided by you during your conversations with the Club's Officers or by its authorised representatives via telephone or in person.

It may also be through your written correspondence, including email and post and when you access and use the Club's Website or web-based channels, including social media platforms; or when you submit an application, survey or form, in hard copy or electronically.

### **3.2 Information collected from third parties**

The Privacy Act permits the Club to collect your personal information from a third party if:

- (a) you consent; or,
- (b) it is unreasonable or impracticable to collect the information directly from you.
- (c) persons who are authorised to act on your behalf;
- (d) publicly available websites and online databases; and national / international bodies relevant to the Club's functions or activities'

### **3.3 Unsolicited personal information**

Unsolicited personal information received by the Club will be assessed and handled in accordance with the Privacy Act. If the Club determines that we can lawfully retain the information, we will take reasonable steps to give you a privacy notice (or ensure you are aware of how we will use and disclose your information), unless it is impractical to do so.

### **3.4 Methods of collection**

Apart from the information which you provide to the Club as part of your Membership information in 2.1 above (and any updates thereof), the Club may collect your personal information through a range of channels, including:-

- telephone, facsimile and written correspondence, including paper and emails;
- newspaper and electronic forms and surveys;
- Meetings / conferences, Mid-Winter Dinners, etc.
- manual and online databases and services
- Websites and web-based channels, including online portals and social media
- Publicly available third-party websites and web-based channels, including social media
- Taped interviews, videos, photographs and audio-visual recordings
- Web analytics and data collection providers.

At or before the time the Club collects your personal information (or as soon as practicable afterwards), the Club will take reasonable steps to provide you with a privacy notice (or ensure you are aware of how we will use and disclose your information), unless it is impractical to do so.

### **3.5 Information handled through our Club website and online services**

A variety of information is handled using the Club's website, web-based channels and third- party online services. Some of this may be personal information, and the way in which our Website uses these facilities is summarised in the table below.

#### **(a) Emails and Electronic forms;**

The Club's server will record your email address if you send the Club a message online. Your email address will not be added to a mailing list unless you have provided it to the Club to subscribe to one of the Club's subscription services.

When you send the Club a message online, the Club's servers do not record your usage data in the form of page URLs that you have visited the Club's websites.

Where you choose to send the Club a completed electronic form that includes your personal details, the Club collects personal information such as your name, address and email address and telephone number.

The information collected by email or electronic forms will be used only for the purpose for which you provided it, unless an exception applies.

For those members who do not wish to use the internet to transmit information, the Club provides alternative ways of providing information. For example, forms may be printed (or obtained in hard copy) and lodged by post.

**(b) Payment Information;**

If members choose to pay for membership subscription or product using secure credit card payment facilities available on the Club's website, you will be asked to provide your credit card details.

**(c) Clickstream Data;**

The Club does not make a record of your visits to its website and logs the following information for statistical purposes

**(d) Google Analytics;**

In addition to web server logs, the Club's website uses Google Analytics, a web analytics service provided by Google Incorporated (**Google**). Reports obtained from Google Analytics are used to help improve the Club's website. Google Analytics uses 'cookies' to help analyse how users use the site.

The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States of America. Google will use this information for the purpose of evaluating your use of the department's website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google.

By using the Club's website, you consent to the processing of data about you by Google in the manner and for the purposes set out above. Please refer to [Google's privacy policy](#) for further information.

**(e) Website Analytics used by Third Party Websites;**

The Club may use third party platforms or websites (such as Facebook, Twitter, Campaign Monitor, LinkedIn and YouTube) to deliver or communicate content about its programs and activities.

The sites managed by those third parties have their own privacy policies and may send their own cookies to your computer. This is different to the Club's use of its own website analytics (such as Google Analytics) for evaluating how individuals use the Club's websites.

The Club does not control the setting of third- party cookies and the Club recommends that you check the third party websites for more information about those cookies and how to manage them.

**(f) Mail Chimp;**

The Club uses MailChimp to provide online tools to create, send and manage emails for the purposes of distributing Club's newsletters and similar communications. MailChimp may collect personal information, such as distribution lists that contain email addresses, and other information relating to those email addresses.

For further information about the type of personal information MailChimp collects, refer to the [MailChimp Privacy Policy](#) available at: <https://www.intuit.com/privacy/statement/>.

MailChimp is based in the United States of America (USA) and the information collected about your use of the website (including your IP address) will be transmitted to and stored by MailChimp on servers located outside Australia.

The Club is required to inform you that by subscribing to one of our email newsletters:

- you consent to your personal information being collected, used, disclosed and stored as set out in MailChimp's & PayPal's Privacy Policy and agree to abide by MailChimp's & PayPal's Terms of Use;
- you understand and acknowledge that this service utilises a MailChimp platform, which is located in the USA and relevant legislation of the USA will apply;
- Australian Privacy Principle 8.1 contained in Schedule 1 of the Privacy Act will not apply; and
- you understand and acknowledge that MailChimp / PayPal are not subject to the Privacy Act and you will not be able to seek redress under the Privacy Act but will need to seek redress under the laws of the USA.

You can opt out of the Club's mailing list if you choose the 'unsubscribe' service provided by MailChimp & PayPal in every email, or by contacting us using the contact details at the end of this policy.

You can also disable or refuse cookies or disable Flash player; however, you may not be able to use the services provided by MailChimp if cookies are disabled.

#### **(g) Website Analytics used by Third Party Websites;**

The Club may use third party platforms or websites (such as Facebook, Twitter, Campaign Monitor, LinkedIn and YouTube) to deliver or communicate content about its programs and activities.

The sites managed by those third parties have their own privacy policies and may send their own cookies to your computer. This is different to the Club's use of its own website analytics (such as Google Analytics) for evaluating how individuals use the department's websites.

The Club does not control the setting of third party cookies and the Club recommends that you check the third party websites for more information about those cookies and how to manage them

#### **(h) Survey Monkey;**

Where appropriate, the Club collects information through SurveyMonkey, a United States-based service. Through SurveyMonkey, the Club also conducts surveys. SurveyMonkey adheres to its own [privacy policy](https://www.surveymonkey.com/mp/legal/privacy/) which is available at <https://www.surveymonkey.com/mp/legal/privacy/>.

## **4. How the Club holds your personal information**

The Club will 'hold' your personal information where it:

- (a) physically possesses a record containing your personal information (including storage on servers owned and operated by the Club); or
- (b) has the right or power to deal with the information, even if it does not physically possess it (such as where the personal information is stored on servers owned or operated by a third party, to which the Club has access to, or in archived files).

### **4.1 Storage and security**

The Club holds personal information in a range of audio-visual, paper and electronic based records (including in cloud-based applications and services). Personal information is held in accordance with the collection and security requirements of the IPPs, and the Club's policies and procedures,

If personal information held by the Club is lost, or subject to unauthorised access or disclosure, the Club will respond in line with the OAIC's [guidance](#). The Club aims to provide timely advice to affected individuals if a data breach is likely to result in serious harm.

## 4.2 Retention and destruction

The Club will comply with all Commonwealth and Victorian legal requirements in relation the retention and destruction of records containing personal information, including information management requirements in the *Archives Act 1983* (Cwth). Further information is available on the [National Archives of Australia](https://www.naa.gov.au/information-management/information-management-legislation) website at <https://www.naa.gov.au/information-management/information-management-legislation>.

## 5. Why the Club collects, holds, uses and discloses your personal information

### 5.1 General purposes

There are many general purposes for which the Club may collect your personal information. The following identifies a summary of these general purposes, aimed at ensuring the good order and conduct of the day-to-day affairs of the Club. At all times, the Club takes reasonable steps to ensure that personal information collected and held by it is used and disclosed on a strictly ***need-to-know basis*** only.

- a) To provide secretarial functions to the Club, its National Council, its Sub Committees, independent committees and other related inhouse purposes.
- (b) To communicate and consult with businesses, committees, individuals, panels, project taskforces and stakeholder groups involved in Antarctic Affairs. From time to time, the Club will provide the contact details of members on a restricted database for access by State / Territory Branch Committees on the basis that previous lists will be destroyed.
- (c) To arrange the election and / or confirm appointment of members to the National Council, Sub-committees, and other project groups, etc.
- (d) To communicate, maintain and provide information to persons, stakeholders or other interested parties who contact the Club. Personal information may only be disclosed for the purposes of administering, responding and briefing on requests etc.
- (e) To provide stakeholders and other interested parties copies of Club Aurora Journal and State Branch / Territory newsletters. Personal address information may be disclosed to third parties who undertake mail out services on behalf of the Club.
- (f) To manage, assess, evaluate and monitor Club's legislative compliance, policies and programs and FOI requests). Personal information will be used for purposes related to the management, assessment, evaluation and monitoring activities and may be used in a non-identifiable manner.
- (g) To nominate and the allow for the selection of members or applicants for Club, National or international awards, etc., in accordance with the Club Rules.
- (h) To operate the Club's website or functions, fulfilling requests, and to otherwise provide information on products and services.
- (i) To manage submissions and enquiries made to the Club through the Club Secretary.
- (j) To provide information or respond to any complaints, compliments or enquiries (including social media).



(k) To enable the Club to do all things to achieve its functions and activities, including projects, programs falling within its responsibilities as set out in its Rules.

## **5.2 Disclosure to third parties**

The Club may disclose your personal information to third parties, where this is permitted under the Privacy Act. If the Club discloses your personal information to a third party, it will take reasonable steps to ensure that the third party handles your personal information in the same manner as the Club and in accordance with the IPPs.

## **5.3 Disclosure to Overseas Recipients**

The Club may in limited circumstances disclose personal information to overseas recipients, where this is reasonably necessary, or directly related to, the exchange with sister organisations ie. the BAS Club.

If it is likely that your personal information will be disclosed to an overseas recipient, we will take reasonable steps to notify you and we will only disclose the information as permitted under the Privacy Act to the overseas organisation, and we will also take reasonable steps to ensure the overseas recipient treats your personal information in accordance with our IPPs, such as through our contractual agreements.

The Club will always undertake Privacy Impact Assessments (PIAs) where the release of personal information is considered as subject to risk.

## **6. How to access and correct your personal information.**

You may request access to personal information that the Club holds about you at any time. At the same time the Club encourages you to keep up-to date your personal information to ensure that that you are able to receive regular communiques from the Club.

All such requests must be made in writing or via email to the Secretary [Secretary@anareclub.org.au](mailto:Secretary@anareclub.org.au) OR to the Club's Membership Officer at [membership@anareclub.org.au](mailto:membership@anareclub.org.au).

It is your responsibility as a member of the Club to ensure that the Club holds your correct personal information.

## **7. How to make a complaint or report a possible privacy breach.**

If you wish to make a complaint about the way the Club has managed your personal information,

**Please contact the Club Secretary at [secretary@anareclub.org.au](mailto:secretary@anareclub.org.au) OR by post at ANARE CLUB Inc., G P O Box 2534, Melbourne, Victoria 3001, Australia.**