



GOLD COAST SUNS PRIVACY POLICY

PROTECTING YOUR PRIVACY

The Gold Coast Football Club Limited (GCFC) is committed to protecting the privacy of every person who deals with GCFC in accordance with the Privacy Act 1988 and the National Privacy Principles. This privacy policy covers all personal information collected by GCFC about individuals.

The GCFC privacy policy seeks to provide a clear and concise explanation of how and when GCFC collects, uses and stores Customer personal information. This privacy policy covers the entire operations of GCFC.

COLLECTING PERSONAL INFORMATION

The information GCFC collects in most cases relates to members and customers, but can also relate to suppliers and other parties GCFC deal with (for the purposes of this privacy policy all people are described as "Customers").

The type of information GCFC collects generally includes a Customer's name, address details, age, date of birth, telephone and fax number, e-mail address, financial details such as credit card and/or bank account details, occupation, product and services preferences and opinions.

GCFC may also need to collect sensitive information from a Customer in circumstances where GCFC believes that the information is necessary for the purpose for which it is collected.

Sensitive information will not be used by GCFC for any other purpose than that for which it is collected. GCFC will not ask a Customer for information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, or details of health, disability or sexual activity or orientation, unless:

1. The Customer provides their consent;
2. The collection of that information is specifically authorized by law;
3. The collection is necessary to lessen a serious or imminent threat to the health or safety of a person; or
4. The collection of the information is necessary for the establishment, exercise or defense of a legal claim.

Personal information about Customers may be collected via the following means:

1. competition entry forms;
2. application forms;
3. email;
4. websites;
5. online transactions;
6. networking functions (for example, business cards);
7. over the phone; and
8. credit card details via credit card purchases.

There may be occasions where GCFC need to source personal information about a Customer from a third party. For example, GCFC may collect personal information from a Customer's employer in respect of corporate hospitality events. GCFC will only use the information obtained for the purpose in which it was collected.

USE OF PERSONAL INFORMATION

GCFC collects personal information for a range of purposes, including the provision of ongoing Customer support and the compiling of Customer databases. Other uses include:

1. providing membership benefits to Customers;
2. providing Customers with products and services;
3. providing Customers with information about products and services available to them from GCFC and associated businesses including information about discounts, competitions and special offers.

GCFC may use or disclose personal information for purposes related or ancillary to the main reason it was collected, such as:

1. improving its relationship with Customers;
2. internal accounting and administration;
3. regulatory reporting and compliance;
4. protecting Customers and GCFC from error and fraud;
5. communicating with a Customer's executor, administrator, trustee, guardian or attorney.

GCFC does not use any prohibited identifiers (such as a tax file number) to identify its Customers.

THIRD PARTIES

There may be circumstances where GCFC will need to provide Customers' personal information to third parties.

Circumstances include where GCFC outsource functions and activities to third parties or where it is necessary for GCFC to provide information to organisations with which GCFC conducts business. Such organisations include related entities, solicitors, legal advisors, accountants, auditors, printers and mailing houses, insurers, telemarketers and marketing consultants.

In these situations GCFC prohibits third parties from using personal information about Customers except for the specific purpose for which GCFC has supplied it. GCFC also ensures that Confidentiality clauses are included in service contracts with these organisations. Notwithstanding this, GCFC cannot be held responsible for any misuse or unauthorized disclosure of Customer personal information by third parties.

CONSENT

Consent can be expressed or implied. Express consent can be verbal or written. Implied consent may be assumed when GCFC can reasonably conclude that a Customer has given consent by some action a Customer takes or when a Customer decides not to take action. This may occur where a Customer has provided personal information for a particular purpose and that purpose cannot be achieved without GCFC making use of the Customer's personal information.

ANONYMITY

Due to the nature of certain transactions conducted between GCFC and its Customers, anonymity is not always possible.



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WHAT IF A CUSTOMER DOES NOT WISH TO PROVIDE GCFC WITH INFORMATION?

In order to provide products and services to its Customers, GCFC requires information about them. If a Customer does not provide GCFC with all of the information GCFC requires, GCFC may be unable to provide products and services to that Customer.

DIRECT MARKETING

Personal information collected for direct marketing purposes will only be collected, used or disclosed with the consent of the relevant Customer as provided for in this Privacy Policy.

In circumstances where GCFC cannot practically obtain the consent of a Customer, then GCFC may still engage in direct marketing to the Customer, but will:

1. advise the Customer that he or she can be taken off the mailing list at any time; and
2. display its contact details clearly in each direct marketing publication.

Customers can be removed from any mailing list by contacting GCFC's Privacy Officer.

UPDATING PERSONAL INFORMATION

GCFC takes reasonable steps to ensure that Customers' personal information is accurate, complete and up-to-date whenever it is collected and used. Customers can update their personal information at any time by contacting GCFC's Privacy Officer.

ACCESS TO PERSONAL INFORMATION

Customers may access their personal information by contacting GCFC's Privacy Officer, however access may be denied where law expressly allows it – for example providing access would have an unreasonable impact on the privacy of others.

Where GCFC does withhold personal information, written reasons will be provided. Requests for access to information are generally processed within 30 days from the date of receipt and a reasonable fee may be charged for access.

MINORS

GCFC has adopted the position proposed by the Privacy Commissioner that a young person is able to give their consent when he or she has a sufficient understanding and maturity to understand what is being proposed.

Where GCFC is aware that it is gathering information from a minor, GCFC will obtain consent from a legal guardian for the collection of the information. Where this is not possible, GCFC staff will make a determination as to the minor's understanding of why the personal information is being collected, before deciding to collect that information.

STORAGE AND SECURITY OF PERSONAL INFORMATION

Personal information may be stored in hardcopy documents, as electronic data, or in GCFC software or systems.

GCFC maintains physical security over its paper and electronic data stores and premises, such as locks and security systems.

GCFC also maintains computer and network security for example, firewalls (Internet security measures) and other security systems such as identifies and passwords to control access to computer systems.

Only authorized users can access Customer personal information and access is only for approved purposes. Personal information will be recorded, amended and deleted only by authorized means and GCFC will endeavour to comply with recognized Australian and International standards relating to information security.

CHANGES TO THIS POLICY

GCFC may modify this privacy policy and the way it handles personal information at any time in its sole discretion.

FURTHER INFORMATION

Further information on privacy can be obtained from the Privacy Commissioner at www.privacy.gov.au.

COMPLAINTS ABOUT PRIVACY

If a Customer has concerns about the privacy, collection or use of their personal information, they should contact the GCFC staff member or department they have been dealing with.

If the complaint remains unresolved, the Customer should contact the GCFC Privacy Officer on the contact details below. GCFC will respond to the query or complaint as soon as possible but not more than 14 days after the complaint has been made.

CONTACT US

Any Customer who has any questions or feedback about privacy or who feels that GCFC is not adhering to its published privacy policy should contact GCFC on:

Phone: (07) 5510 6000

Mail: Privacy Officer
Gold Coast FC
PO Box 4952
GOLD COAST MC QLD 9726

Fax: (07) 5594 1354

Email: privacy@goldcoastfc.com.au