



Privacy Policy

The Portugal Madeira Sydney Social and Cultural Sports Club Limited (Portugal Madeira Club) collects personal information from its members, employees, guests and visitors through its authorized representatives, such as clubhouse officers, employees, website and social media network.

Personal information provided to our authorized representatives is used solely to process internal tasks related to your requests. Once these requests are completed the personal information provided will be destroyed except for personal information which we are required to keep in order to comply with Commonwealth and New South Wales' legislation.

Sections of our social media network are provided and hosted by third-party companies, such as Facebook and LinkedIn which require users to subscribe to third-party services. Personal information that is collected by the third-party companies is kept by the third-party companies.

Why do we collect personal information?

Portugal Madeira Club collects personal information, such as names, date of births, addresses, contact details and comments as typed into our webpages. The reasons why the Portugal Madeira Club collects personal data are, the following:

1. To enable you to contact the:
 - a. Individual members of the Board of Management.
 - b. Portugal Madeira Club's Secretary.
 - c. The Portugal Madeira Club's office 24/7.
 - d. The Portugal Madeira Club on your favourite device.
2. To enable you to:
 - a. Place online office requests to the Office 24/7.
 - b. Purchase products and services from us on our website.
 - c. Tell us what you think about our published content.
3. To comply with:
 - a. Registered Clubs legislation and regulations.
 - b. New South Wales legislation.
 - c. Commonwealth legislation.

The Portugal Madeira Club does not collect, nor does it keep any personal financial information at all, such as credit and debit cards' information (card numbers, expiry dates and CVC codes).



What types of personal information is collected?

The Portugal Madeira Club and its authorized representatives collect different types of personal information. They are the following:

1. Members Information

A Members information database is kept by the Portugal Madeira Club as required by our Articles of Association and by the Rules of Registered Clubs as set in the NSW Registered Clubs Acts of 1976. This personal information is solely used to:

- Print the Portugal Madeira Club Members' Card.
- Verify the identity of members entering our clubhouse.
- Contact members regarding club matters.
- Contact members' families or friends in case of an emergency.

Members can update their contact details as needed in person by visiting our office during office hours or by filling a request form with their details on our website page (<https://portugalmadeiraclub.com.au/members/notify-club/>).

The members' personal information collected by our website is secure and is transmitted to our office in encrypted format where it will be authenticated by the Secretary of the Club before being processed.

2. Employees Data

We are obliged to keep personal and sensitive information about our employees to comply with Commonwealth and New South Wales legislation. We keep the following information from our employees:

- a. Full Name
- b. Contact details
- c. Tax File Number
- d. Superannuation Fund details
- e. Bank account details

Some of the employees' personal information maybe disclose with external parties, such as accountants, insurance companies and industry regulators but only when required and permitted by law, such as processing of financial information.

3. Gaming Information

Whenever members or guests play our gaming machines and win, we are required to maintain a logbook of all prizes paid to gaming winners. This is standard procedure on Registered Clubs and mandatory by law. The Club will keep a record of the following information:

- a. Name of Game Winner
- b. Club Membership ID, Temporary ID or Visitor ID
- c. Amount, date and time of payment.



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4. Online Comments

Comments may be posted onto our website by all visitors. Every time that a website visitor posts a comment on it, the website collects the visitor's IP address plus the visitor's browser user agent string to help with spam detection.

An anonymised string created from your email address (also called a hash) may be provided to the Gravatar service to see if you are using it. The Gravatar service privacy policy is available here: (<https://automattic.com/privacy/>).

5. Cookies

If you post a comment on our website, you may opt-in to saving your name, email address and website in cookies. This is for your convenience so that you do not have to fill in your details again when you post any another comments. These cookies will last for one year.

If you have an account and you log in to our website, it will set a temporary cookie to determine if your browser accepts cookies. This cookie contains no personal data and is discarded when you close your browser.

When you log in, the website will also set up several cookies to save your login information and your screen display choices. Login cookies last for two days, and screen options cookies last for a year.

If you select "Remember Me", your login will persist for two weeks. If you log out of your account, the login cookies will be removed.

If you edit or publish an article, an additional cookie will be saved in your browser. This cookie includes no personal data and simply indicates the post ID of the article you just published or edited. It expires after 24 hours.

6. Digital Forms

Some webpages of our website include digital forms on which visitors can type information and upload content. This information is collected for the sole purpose of contacting our office personnel and lodging administrative requests. Each digital form collects different type of information according to the following types of requests:

- | | |
|---------------------------|---|
| a. Notify the Secretary | {Name, email, phone, address, short message, member ID} |
| b. Contact us | {Name, email, phone, short message} |
| c. Employment Application | {Name, email, phone, resume} |
| d. Sponsor the Club | {Name, email, phone, website address, short message, ABN} |
| e. Join SMS Group | {Name, phone number, member ID} |

The information collected by each digital form will also include the visitor's IP address and the browser's user agent string. Once our office personnel process your request, the information collected by the website's digital form is deleted.



7. Media Content

Some of our digital forms allow users to upload media to our website. If you upload images, you should avoid uploading any with embedded location data (EXIF GPS) included. Visitors to our website can download and extract any location data from images on the website.

8. Embedded content from other websites

Some of our webpages contain embedded content from third-party websites. Videos, images and text which are posted and stored on external websites, such as Facebook and at YouTube, appear embedded within our own website.

Embedded content from other websites does behave in the exact same way as if the visitor has visited the other websites.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracking your interaction with the embedded content if you have an account and are logged in to that website.

9. Email

Personal information that we may receive by email travels through many devices throughout the internet until it reaches our email services. The Portugal Madeira Club email service transmits all information in encrypted format by default.

All information transmitted between our email services and our office computers is never transmitted in plain text at all. It is always transmitted in encrypted format which renders it unusable if it is ever caught while in transit through the internet.

All information transmitted by our email services and any email app hosted on personal mobile devices owned by representatives of the Portugal Madeira Club is also transmitted in encrypted format by default. This is in line with Club's insurance requirements which demand that any user with a mailbox at the Portugal Madeira Club email service must only transmit information using encrypted protocols.

How long do we retain your information?

If you post a comment on our website, the comment and its metadata are retained indefinitely. This is so that, our website can recognise and approve any follow-up comments automatically instead of holding them in a moderation queue.

For users that register on our website, we also store the personal information they provide in their user profile. All users can see, edit, or delete their personal information at any time (except they cannot change their username). Website administrators can also see and edit that information.

Uploaded resumes from users that apply for employment with the Club and are not successful, will be deleted once the employment vacancy has been filled.



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Where we send your information?

Visitor comments which are posted on this website are protected by Akismet Anti-Spam service. Its privacy policy is available here: "<https://automattic.com/privacy>". Some comments left on this website may be sent to the Askimet Anti-Spam service for processing.

Personal information collected by digital forms inside our webpages will be sent to the Portugal Madeira Club office only. This information is sent from our website to our email service where it stays until collected by the Portugal Madeira Club office personnel via email applications using encrypted protocols.

Personal information left on our website is not sold, nor is it shared with any third-party companies. Some of the employee's personal information may be shared with third-party accounting firms for the purpose of the creation of wage slips and financial obligations as approved by the Management Board.

What rights you have over your information?

If you are a registered user of our website, or have posted comments, you may request an exported file of the personal information that we hold about you, including any information that you have provided to us. Requests should be sent by email to:

webmaster@portugalmadeiraclub.com.au

You may also request that we erase any personal information that we hold about you. This does not include any information that we are legally required to retain for administrative or legal purposes.

Additional information

a. How do we protect your information?

To protect the users' information, we ensure that all information transmitted and received by our website is never done in clear text format. Every data packet is always encrypted while in transit throughout the internet.

All comments which are posted on this website are protected by the Akismet Anti-Spam service. Its privacy policy is available here: "<https://automattic.com/privacy>".

Our representatives who have a mailbox account with the Portugal Madeira Club email services use only encrypted protocols to transmit information between their devices and our email services.



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b. What Anti-Spam procedures do we have in place?

The Australian Spam Act 2003 (Cth) prohibits the sending of 'unsolicited commercial electronic messages' (known as spam) with an 'Australian link'. Our mailboxes are protected with up-to-date anti-spam software.

Portugal Madeira Club does not send out unsolicited email messages at all. All the emails that we send out originate from our domain name: "portugalmadeiraclub.com.au".

If you receive any spam messages which may appear to be spam originated on behalf of the Portugal Madeira Club, you can help the Australian Communications and Media Authority (ACMA) fight spam by forwarding those messages to the Australian Spam Intelligence Database at: report@submit.spam.acma.gov.au.

When forwarding spam email, don't change the subject line or add additional text. ACMA will contact you should they require any further information.

c. What data breach procedures we have in place?

A data breach is an unauthorised access, disclosure or loss of personal information. A data breach may be caused by malicious action (by an external or insider party), human error, or a failure in information handling or security systems.

Data breach examples:

- I. Loss or theft of physical devices (personal computers, smart devices and storage devices) or paper records that contain personal information.
- II. Unauthorized access to personal information by an employee.
- III. Inadvertent disclosure of personal information due to 'human error', for example an email sent to the wrong person.
- IV. Disclosure of an individual's personal information to a scammer, as a result of inadequate identity verification procedures.

Should a breach occur, the Portugal Madeira Sydney Social and Cultural Sports Club Limited would follow the **Notifiable Data Breaches Scheme**, notify any affected individuals and the **Office of the Australian Information Commissioner** if a breach occurs which may be likely to result in any serious harm to individuals whose personal information is affected.

Furthermore, the Office of the Portugal Madeira Sydney Social and Cultural Sports Club Limited will post a notice for each notifiable data breach on its clubhouse message board and on its website: <https://portugalmadeiraclub.com.au>.

d. What third parties do we receive data from?

Some of our website pages may receive information from third-party companies, such as Facebook and Google. This information is composed of calendar events and advertisements for upcoming events, which are generated by our office personnel on our Social Media network.



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e. What automated decision making, or profiling do we do with user information?

We do not use personal information in automated decision making or in user profiling at all. We only keep personal information for the reasons outlined at the beginning of this policy under the heading of: **Why we collect personal information?**

f. Industry regulatory requirements

This policy was drafted by [Antonio Fernandes](#) based on the following legislation:

- a. [Australian Privacy Act \(1988\)](#)
- b. [Australian Privacy Principles \(APP\)](#)
- c. [Notifiable Data Breaches Scheme \(2014\)](#)
- d. [General Data Protection Regulation \(2016\)](#)