



SMS Privacy Policy for Carnarvon Golf Club Ltd

Effective Date: 1st February 2025

At Carnarvon Golf Club Ltd ("we," "us," or "our"), located at 65-95 Nottinghill Road, Lidcombe NSW 2141, Australia, we are committed to protecting your privacy. This SMS Privacy Policy explains how we collect, use, disclose, and safeguard your personal information when you opt in to receive SMS messages from us, such as event updates, promotions, or membership information. By opting in, you agree to the terms of this policy.

1. Information We Collect

We may collect the following personal information when you opt in to our SMS program:

- Your mobile phone number
- Your name (if provided)
- Any additional information you voluntarily provide via SMS (e.g., responses to event RSVPs or inquiries)

We collect this information when you:

- Sign up through our website (www.carnarvongolf.com), membership forms, or at our club premises
- Text a keyword to opt in (e.g., "JOIN" to our dedicated number)
- Provide your details during membership registration, event sign-ups, or other interactions with the Club

2. How We Use Your Information

We use your information to:

- Send SMS messages about club activities, including event reminders, tee time confirmations, promotional offers, membership updates, or course information
- Respond to your inquiries or feedback sent via SMS
- Improve our SMS communications and member services

We will only send messages related to the purposes you've consented to, such as golf club events or services, and we will not use your information for unrelated purposes.

3. Consent and Opt-In

Under the **Spam Act 2003**, we require your express or inferred consent to send commercial SMS messages. By providing your mobile number and opting in, you give express consent to receive SMS messages from Carnarvon Golf Club Ltd. You confirm that:

- You are the owner or authorized user of the mobile number provided
- You are at least 18 years old (or have parental permission if under 18)

Opting in is voluntary and not a condition of membership or participation in club activities.

4. Data Sharing

We do not sell, rent, or share your personal information with third parties for their marketing purposes. We may share your information with:

- Service providers who assist in delivering SMS messages (e.g., messaging platforms), who are bound by confidentiality and privacy obligations
- Regulatory or legal authorities, if required to comply with Australian laws or protect our rights

5. Data Security

We take reasonable steps to protect your personal information, in line with the **Australian Privacy Principles (APPs)** under the **Privacy Act 1988**. This includes using secure systems and encryption for data storage and transmission. However, no method of transmission is 100% secure, and we cannot guarantee absolute protection.

6. Opt-Out and Your Rights

You can opt out of receiving SMS messages at any time by:

- Replying "STOP" or "UNSUBSCRIBE" to any SMS message
- Contacting us at info@carnarvongolf.com.au or (02) 9649 6255

We will process your opt-out request promptly, typically within 5 business days, and confirm cessation of SMS messages. You may still receive non-commercial messages (e.g., membership renewals or booking confirmations) unless you specify otherwise.

Under the **Privacy Act 1988**, you have the right to:

- Access the personal information we hold about you
- Request corrections to inaccurate information
- Request deletion of your information (subject to legal obligations)

To exercise these rights, contact us at info@carnarvongolf.com.au. We will respond within a reasonable period, typically 30 days.

7. Message Frequency and Costs

The frequency of SMS messages depends on the program you've joined (e.g., weekly event updates or monthly promotions). We will inform you of expected frequency at opt-in. Standard message and data rates may apply, depending on your mobile carrier plan. Please check with your carrier for details.

8. Third-Party Infrastructure

SMS messages may pass through third-party systems, such as mobile carriers or messaging platforms, which are outside our control. We are not responsible for the security of data transmitted through these systems.

9. Changes to This Policy

We may update this policy to reflect changes in our practices or legal requirements. We will notify you of significant changes by posting the updated policy on our website ([Insert Website URL, if applicable]) or sending an SMS notification. Your continued participation in our SMS program after changes constitutes acceptance of the revised policy.

10. Contact Us

For questions, concerns, or complaints about this policy, please contact:

Carnarvon Golf Club Ltd

65-95 Nottinghill Road, Lidcombe NSW 2141, Australia

Email: info@carnarvongolf.com.au

Phone: (02) 9649 6255

If you're unsatisfied with our response to a privacy concern, you can contact the **Office of the Australian Information Commissioner (OAIC)** at www.oaic.gov.au.

Key Considerations for Carnarvon Golf Club Ltd

- **Spam Act 2003 Compliance:**
 - Ensure all SMS messages include a clear opt-out mechanism (e.g., "Reply STOP to unsubscribe").
 - Identify the sender as Carnarvon Golf Club Ltd in every message.
 - Only send commercial messages to those who have given express consent (e.g., ticking a box or texting a keyword) or inferred consent (e.g., existing members who provided their number for club-related communications).
 - Keep records of consent (date, time, and method) to demonstrate compliance if audited.
- **Privacy Act 1988 Compliance:**
 - Follow the **Australian Privacy Principles (APPs)**, particularly APP 3 (only collect necessary data) and APP 11 (secure data appropriately).
 - Be transparent about data use in your opt-in process (e.g., state that SMS will include "event updates and promotions").
 - Provide easy access to your privacy policy (e.g., link on your website or in membership forms).
- **Membership Context:**
 - Since your audience includes club members, clarify whether SMS is for all members or a specific opt-in group (e.g., those who join a promotions list).
 - Consider offering separate consent options for transactional messages (e.g., tee time confirmations) vs. marketing messages (e.g., event promotions).
- **Practical Steps:**
 - Use a compliant SMS platform (e.g., ActiveCampaign or MessageMedia, common in Australia) that supports Spam Act requirements, such as automated opt-out handling.
 - Display your privacy policy at key touchpoints: club website, membership forms, or signage at the clubhouse.
 - Train staff to explain the SMS program and opt-in process clearly to members.
- **Local Context:**
 - As a NSW-based business, ensure compliance with Australian federal laws, as there are no additional state-specific privacy laws for SMS in NSW.
 - If you serve international members (e.g., visitors from the EU), consider GDPR requirements for their data, such as explicit consent and data portability rights.