



## Memo

**To:** District and Club Secretaries

**C.C.** BQ Board

**From:** Brett Wilkie - CEO

**Date:** Thursday 2 December 2021

**Ref:** 21/024

**Re:** BowlsLink Privacy Concern

Bowls Queensland has fielded many questions as to why it decided not to take up Bowls Australia's offer of investing a large sum of money into the BowlsLink Membership and Competition Management System. The Board of Bowls Queensland would like to advise districts and clubs of its concerns regarding this system.

Currently, Bowls Queensland has in use a data base considered to be in accordance with the Australian Privacy Act, as well as an events programme for use by districts and clubs free of charge.

Bowls Queensland have raised concerns with Bowls Australia regarding its Privacy Policy, this policy currently allows Bowls Australia to share members private information to outside organisations for the use of direct marketing. The following is an excerpt from the current Bowls Australia Privacy Policy:

### **Disclosure**

**BA may disclose a person's personal information to a range of organisations which include, but are not limited to:**

- (a) BA Affiliates and other organisations involved in bowls programs in Australia;**
- (b) Companies BA engages to carry out functions and activities on BA's behalf, including direct marketing;**
- (c) BA professional advisers, including accountants, auditors and lawyers;**
- (d) BA insurers;**
- (e) Relevant sporting bodies such as World Bowls, Australian Sports Commission, the Australian Sports Anti-Doping Authority, Australian Institute of Sport, the Australian Commonwealth Games Association, various National Sporting bodies, Federal and State Departments of Sport amongst others; and,**
- (f) In other circumstances, permitted by law.**

### **Direct marketing**

**BA will assume consent to use non-sensitive personal information to provide better services and for marketing purposes (including disclosure of such information to service providers).**

**Every person whose data is collected by BA has the option to refuse e-mail, SMS or posted offers by making a request in writing to BA via the contact details set out below, or by making use of the opt-out procedures included in any communications from BA (however, information relating to the option to unsubscribe from those communications may be retained).**



# Bowls Queensland

ABN 17 231 978 960

72 Pickering Street, Enoggera Q 4051 Postal: PO Box 476, Alderley Q 4051

Telephone: 07 3354 0777 Facsimile: 07 3354 0788

Email: [admin@bowlsqld.org](mailto:admin@bowlsqld.org) Web: [www.bowlsqld.org](http://www.bowlsqld.org)

The full Bowls Australia Privacy Policy can be found at the following link: [BA-Policy-Privacy-March-2018.pdf \(bowls.com.au\)](#)

Due to this Privacy Policy, the Board of Bowls Queensland have refused to share private information of registered members of Bowls Queensland affiliated clubs. The Board does not want to expose members to the potential of direct marketing from third parties without their consent and believe this should be a decision of the member to opt in, instead of their information being shared and then having to opt out, or email BA to be removed. Another concern is that BA "assume consent", Bowls Queensland believe this consent should be obtained prior to possibility of their information being shared.

Many clubs' constitutions state that the club does not have the right, without the authority of the member, to hand out personal sensitive information.

Bowls Queensland believe there are a number of people who do not want their personal information, including home and email addresses, shared because of their personal circumstances.

This issue was raised and discussed at the Bowls Queensland September Council Meeting involving the 40 District Delegates, these Delegates voted to not pursue the BowlsLink system at this point in time.

Any club or district attempting to download sensitive information from the Bowls Queensland database and supplying to third parties may be liable to legal action. Refer to Bowls Queensland Online Database Privacy Policy: [Bowls Queensland \(bowlsqldonline.org\)](#)

Kind Regards

Brett Wilkie  
**CEO**