

Epping Eastwood Football Club Incorporated

Privacy Policy

Adopted - [# insert date #]



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1. Epping Eastwood Tigers Football Club

1.1 Our Club

This document is the privacy policy adopted by the Epping Eastwood Tiger Football Club (**Club**) to comply with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles introduced by the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* (Cth).

1.2 Our Objectives

The objects of the Club are to:

- (a) foster and develop the game of football (soccer) in the Epping Eastwood area;
- (b) participate in, foster and support the game of football (soccer) and competitions conducted by the GHFA, the FNSW, the FFA or any 1 or more of them; and
- (c) do all such other things as are incidental or conducive to the attainment of the objects of the Club.

1.3 Our Commitment

- (a) The Club is committed to managing personal information in a secure and responsible manner and in accordance with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles introduced by the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* (Cth).
- (b) This Policy sets out the way in which the Club collects, uses and discloses personal information and also explains your rights and how to contact us.

2. Your Personal Information

2.1 Collection

- (a) The Club may collect, use and disclose the personal information of players, referees, Club officials, team officials, coaches, ticketholders, administrators, participants and other individuals in conducting the Club's affairs and as further described in this Policy.
- (b) The precise nature of the collection, use and disclosure of personal information by the Club depends on your interactions with the Club.

2.2 Types of personal information

The types of personal information held by the Club may include your:

- (a) name;
- (b) address;
- (c) phone numbers;
- (d) email address;

- (e) date of birth;
- (f) gender;
- (g) occupation;
- (h) educational institution or educational qualifications or both;
- (i) coaching qualifications or refereeing qualifications or both;
- (j) employment;
- (k) disciplinary history;
- (l) driver's licence;
- (m) birth certificate; and
- (n) social media details;
- (o) participation history with the Club;
- (p) membership history with the Club, GHFA, other clubs who participate in competitions administered by GHFA, FNSW or FFA; and
- (q) details of the goods or services ordered or purchased from the Club.

2.3 Sensitive information

- (a) In certain circumstances, the Club may collect information about your health or other sensitive information about you (for example, information about your racial or ethnic origin or information about your physical health).
- (b) The Club may use health information about you to ensure that the football programs in which you participate are appropriate for you.
- (c) The Club may use health information as required by the FNSW or FFA or both, including for the purposes medical and anti-doping testing and investigations.

2.4 Research purposes

The Club may use health information and other sensitive information which has been de-identified to carry out research, to prepare submissions to government or a government body or to plan events and activities. De-identified information is information which has been aggregated or otherwise de-identified so that it cannot be used to identify you or any other individual.

2.5 Policy application

When you provide the Club with personal information, this Policy will apply to the way the information is collected, used, disclosed and stored by the Club. If you chose not to provide certain personal information, the Club may not be able to communicate with you. It may also affect the Club's ability to provide you with an opportunity to participate in football competitions and other football related initiatives involving the Club.

3. Personal information from third parties

3.1 Third parties

The Club may collect personal information from you or from a third party.

3.2 Collection method

The Club will collect your personal information in a variety of ways including:

- (a) use of paper forms;
- (b) use online portals; and
- (c) other electronic or paper correspondence to collect this information.

3.3 Collection examples

Examples of how the Club may collect personal information from you include:

- (a) use of the Club's website;
- (b) when you provide it to the Club by filling in forms approved by the Club from time to time (including when you register to play football, register for a coaching or other courses);
- (c) when you contact the Club;
- (d) when you engage with the Club using social media;
- (e) when you subscribe to receive newsletters or other information from the Club; or
- (f) when you lodge a claim or complaint with the Club.

3.4 Collection from third parties

The Club may also collect personal information about you from third parties. Examples of this may take place include:

- (a) when you purchase Club related merchandise or other merchandise from third party vendors;
- (b) when you conduct affairs with the Club's sponsors, and suppliers;
- (c) when the Club interacts with your representatives or agents;
- (d) when you interact with FFA (including from FFA's MyFootballClub Customer Relationship Management System (MyFootballClub)), or another FFA Member Federation, or a branch, association, club, affiliate member, referees' body and/or a competition administrator registered with FFA or with FNSW from time to time (Football Administrators); and
- (e) when you interact with the organisations identified under clause 5 (Disclosing Your Personal Information).

4. Using your personal information

4.1 Use

The Club may use the personal information (including photographs, video and other forms of recording) collected about you in a variety of ways, including:

- (a) to verify your identity;
- (b) to ensure compliance with laws, rules, regulations, policies, procedures and other governing documents relating to football administered by the Club, GHFA, FNDE or FFA;
- (c) to organise, conduct and promote football competitions, matches, tournaments, programs and other events (including for distributing newsletters, providing information and making ticket offers) and to meet any other objectives stated in the Club's constitution;
- (d) to process the registration of individuals to participate in football competitions, tournaments, matches, programs and other events, as a player, official or otherwise;
- (e) to develop programs, activities, events, products, services and merchandise relating to football and the Club;
- (f) to provide you with information about our products and services, including information about Club affairs which may be of interest to you, some of which may be provided by, or in conjunction with, FNSW, FFA, government agencies or GHFA;
- (g) to investigate and take action in connection with any disciplinary, dispute or grievance processes mandated by FFA or GHFA's Constitution, by laws, rules, regulations, policies, procedures or other governing documents;
- (h) to satisfy our obligations and to comply with applicable statutes, regulations and policies as a member association of GHFA and, ultimately, the national governing body, FFA;
- (i) to maintain participation and service/benefit records, data and statistics, including for archive and historical purposes;
- (j) for direct marketing communications from the Club in relation to products, services;
- (k) to contact you if you win a prize in a competition you have entered and to send the prize to you; and
- (l) any use that is reasonably apparent at the time the information is collected.

4.2 Opt out

You will be able to opt-out of direct marketing at any time, if you so choose, by utilising the unsubscribe feature on electronic marketing communications, or in the case of other direct marketing materials by contacting the Club, in accordance with section 10.

5. Disclosing your personal information

5.1 Disclosure to third parties

The Club may also share your personal information with third parties in the conduct of the Club's affairs including:

- (a) FNSW or FFA or GHFA to deal with disciplinary, dispute or grievance proceedings;
- (b) the Australian Sports Anti-Doping Authority, and Court of Arbitration for Sport in connection with any proceedings or investigations being conducted by them;
- (c) third party service providers, such as ticketing agents, venue operators, event organisers, IT providers and social media websites;
- (d) health providers or professionals;
- (e) the Club's insurers;
- (f) the Club's professional advisors, including our accountants, auditors and lawyers;
- (g) as required or authorised by law or where we have a public duty to do so,;
- (h) where you have consented to your personal information being disclosed to others;
- (i) NSW Office of the Children's Guardian;
- (j) NSW Department of Sport and Recreation; and
- (k) NSW Department of Family and Community Services.

5.2 Privacy and third parties

If you receive a product or service from, or your information is otherwise collected by, a third party, the relevant third party may have a separate privacy policy which applies to their collection, use and disclosure of your personal information. You should refer to that privacy policy for further details about how the relevant third party may collect, process, use, store and disclose your information and how you can contact the relevant third party if you have any queries, or wish to make a complaint, about their handling of your personal information.

6. The Club's website, Cookies and other technologies

6.1 Club website

If you visit the Club's website, the Club may record information such as your Internet Protocol (**IP**) address, browser type, Internet Service Provider (**ISP**), referring/exit pages, operating system, the Club's website pages accessed and any information downloaded. This information is used for statistical, reporting and website administration and maintenance purposes, including identifying usage trends, to track users' movements around the Club's website and to gather demographic information about the Club's website users collectively.

6.2 Cookies

Like many other websites, the Club's website may use 'cookies' from time to time. A cookie is a piece of information that allows us to identify and interact more effectively with your device. The cookie helps the Club to maintain the continuity of your browsing session and

remember your details and preferences when you return. You can configure your web browser software to reject cookies however some parts of the Club's website may not have full functionality in that case.

6.3 Other technologies

The Club and its third party service providers may use cookies and other technologies such as web beacons and JavaScript on a the Club's website in connection with online services like banner advertising, website analytics and surveys to collect information about your use of the Club website. The use of these technologies allows the Club and its third-party service providers to evaluate a user's use of the Club's website, deliver customised advertising content, measure the effectiveness of the advertising and provide other services relating to website activity and internet usage. The services the Club may use from time to time include Google Analytics and Facebook. You can find more details in the privacy policies for those services, including information on how to opt-out of certain conduct.

6.4 Email

When the Club sends you emails or other electronic messages, the Club may record where you open the message and click on particular links. This helps the Club to better understand what information is of interest to you.

7. Protecting your personal information

7.1 Privacy Officer

The Club takes the security of personal information seriously. The Club has appointed a Privacy Officer to oversee the Club's management of personal information in accordance with this Policy and the *Privacy Act 1988 (Cth)*.

7.2 Club actions

The Club takes reasonable steps to protect the security and privacy of your personal information. The Club has directed its personnel that personal information must be dealt with in accordance with this Policy and kept secure from unauthorised access or disclosure.

7.3 Information in transit

If you are considering sending us any other personal information through the Club website or other electronic means, please be aware that the information may be insecure in transit, particularly where no encryption is used (e.g. email, standard HTTP). Any transmission is therefore at your own risk. Once the Club has received your personal information, the Club will take reasonable steps to protect all personal information within its direct control from unauthorised access.

7.4 Passwords

Where the Club has given you (or where you have chosen) a password which enables you to access certain parts of the Club website, you are responsible for keeping this password confidential. The Club recommends that you do not share the password with anyone and to change it regularly.

8. Disclosure abroad

8.1 Data server location

- (a) The Club will store personal information on data servers that are controlled by or behalf of the Club and are located within the geographical borders of Australia where reasonably possible.
- (b) Sometimes the personal information that the Club collects may be disclosed to certain recipients, and stored at certain destinations, located outside Australia from time to time. For example, your personal information may be transferred outside of Australia if any of the Club's servers from time to time are located outside Australia, or if one of the Club's service providers or suppliers is located in a country outside Australia, or for disciplinary purposes, or in relation to international transfer certificates, passports, training compensation, mediation, arbitration or similar matters.

8.2 Recipients located abroad

- (a) In all cases, by providing your personal information to the Club or using the Club's, you consent to the disclosure of your personal information outside Australia as set out in this Policy, and acknowledge that the Club is not required to ensure that overseas recipients handle your personal information in compliance with Australian privacy law.
- (b) The Club will take reasonable steps to ensure that overseas recipients only use and disclose such personal information in a manner which is consistent with this Policy. You may have rights to enforce such parties' compliance with applicable data protection laws, but it is possible that you will not have recourse against those parties under the *Privacy Act 1988 (Cth)* in relation to how those parties treat your personal information.

9. Access and correction

9.1 Access and correction

The Club takes all reasonable precautions to ensure the personal information that the Club collects, uses and discloses is accurate, complete and up-to-date. The accuracy of that information depends on the information you provide. The Club recommends that you notify the Club if there are any errors in your personal information and keep us up-to-date with changes to your personal information such as your contact details.

9.2 Access right

You have the right to access the personal information the Club holds about you, and can request the correction of your personal data if it is inaccurate, incomplete or out of date. If you would like to do so, please contact the Club's Privacy Officer to submit an enquiry to access or update the personal information the Club holds about you.

10. Opt out of direct marketing

10.1 Opt out

You can opt out of receiving further messages or communications from the Club at any time by following the unsubscribe instructions in the message sent to you. If you wish to unsubscribe from communications that the Club sends to you, you can also send an email to the Club at the address stated in the Club website.

11. Policy changes

11.1 Changes

The Club may modify, alter or otherwise update this Policy at any time by publishing the new version of the Policy on the Club's website. The Club will indicate any changes by updating the date of this Policy. If you have any questions about this Policy, please contact the Club at the address stated in the Club's website.

12. Contacting the Club and complaints

12.1 Contact

For any queries relating to this Policy you should the Club Secretary by:

- (a) sending an email to president@eppingeastwoodtigers.com.au; or
- (b) sending letter to the Club at PO Box 301 Epping NSW 2121.

12.2 Complaints

- (a) You may complain about the Club's collection, use or disclosure of your personal information by contacting the Club Secretary using the contact details state din this Policy with your full name and contact details, together with a detailed description of the complaint.
- (b) The Club will respond to your complaint within a reasonable period and inform you of the next steps we will take in dealing with your complaint. If the Club is unable to resolve your complaint, the Club will inform you of the steps available to you in those circumstances.

13. Definitions and Interpretation

13.1 Definitions

In this Policy:

Club means the Epping Eastwood Football Club Incorporated.

GHFA means Gladesville Hornsby Football Association Inc (ABN 25 328 153 207) of Christie Park, Christie Rd, Macquarie Park NSW 2113.

FFA means Football Federation Australia Limited (ABN 28 106 478 068) of Locked Bag A4071, Sydney South, NSW, 2000.

FNSW means Football New South Wales Limited ABN 25 003 265 923 of 235 Muerants Lane Glenwood, NSW, 2768.

Policy means this privacy policy and includes all schedules and annexures to it (if any).

Secretary means the person for the time being holding the office of secretary of the Club.

13.2 Interpretation

In this Policy, headings are inserted for convenience only and do not affect the interpretation of this agreement and unless the context otherwise requires:

- (a) the singular includes the plural and vice versa;
- (b) a gender includes the other gender;
- (c) if a word or phrase is defined, its other grammatical forms have a corresponding meaning;
- (d) the meaning of general words is not limited by specific examples introduced by 'includes', 'including', 'for example', 'such as' or similar expressions;
- (e) a reference to a statute, code or other law includes regulations and other instruments under it and consolidations, amendments, re-enactments or replacements of any of them; and
- (f) a reference to a person includes an individual, a partnership, a corporation or other corporate body, a joint venture, a firm, a trust, an association (whether incorporated or not) and a public authority;