

## PRIVACY POLICY

### PURPOSE

To embed a culture of privacy adherence at the Aspley Hornets Australian Football and Sporting Club and to commit to treating all personal information as a valuable business asset to be respected, managed and protected in accordance with the *Privacy Act 1988 (Cth)*.

### SCOPE

This policy applies to all parties whose personal information we collect including our customers, board members, team member, trainees, apprentices, work experiencers, contractors, football club participants and volunteers.

### DEFINITIONS

Term	Definition
Privacy of personal information	Involves the establishment of rules governing the collection and handling of personal data wherever personally identifiable information or other sensitive information is collected, stored, used, and finally destroyed or deleted – in digital form or otherwise.
Personal information	Is information that identifies you or could reasonably identify a person. Common examples include names, signatures, addresses, telephone numbers, medical records, bank account details and commentary or an opinion about a person.
Sensitive information	Some types of personal information, called “sensitive information” are considered particularly sensitive, and given a higher level of protection. Sensitive information includes information about a person’s health, their religion, politics, racial or ethnic origin, sexual orientation, tax file numbers, credit information and health information.
Disclosure	A person discloses information if they: cause the information to appear, allow the information to be seen, make the information known, reveal the information or lay the information open to view. Disclosure occurs when information is made available to a person or organisation outside of the Aspley Hornets Football Club.

### RESPONSIBILITIES

#### Board President on Behalf of Board

- Key privacy officer, responsible for handling internal and external privacy enquiries for all football club issues and complaints including children/parents, volunteers and football club contractors.
- Investigate any complaints about privacy using the incident reporting form;
- Offer support to people who experience breach of privacy and breaches of child protection legislation;
- Avoid release of private and personal information and respect the confidentiality of complainants;

- Implement the compliant resolution procedures as required;
- Take steps to educate and make football club participants making them aware of their obligations under this policy and the law;
- Verify the authenticity of all third party request for information always checking with the owner of information before its disclosure.
- Maintenance of the security of personal information in electronic databases.
- Seriously consider requests for information by ensuring all request are made formally in writing and establishing the identity of the requestor by verifying their place of business, contact details and requirement for the information. Must always check with the owner of the information and gain their approval to release any information to a third party.

## **General Manager:**

- Key privacy officer, responsible for handling internal and external privacy enquiries for all club related issues inclusive of team members, contractors and customers.
- Investigate any complaints about privacy using the incident reporting form;
- Offer support to people who experience breach of privacy and relevant employment laws.
- Avoid release of private and personal information and respect the confidentiality of complainants;
- Implement the compliant resolution procedures as required;
- Take steps to educate and make team members, customers, trainees, apprentices, work experiencers, contractors making them aware of their obligations under this policy and the law;
- Verify the authenticity of all third party request for information always checking with the owner of information before its disclosure.
- Maintenance of the security of personal information in electronic databases.
- Seriously consider requests for information by ensuring all request are made formally in writing and establishing the identity of the requestor by verifying their place of business, contact details and requirement for the information. Must always check with the owner of the information and gain their approval to release any information to a third party.

## **All Team members**

- Refer formal complaints about breaches of this policy to the appropriate Privacy Officer as listed above and get the person involved to fill in an incident report form;
- Understanding of this privacy policy, in particular ensuring frontline team members are trained and aware of this policy, how to fill in an incident report and who to refer complaints to; and
- Ensure team members, volunteers and customers who raise an issue or make a complaint are not victimised and their information is kept confidential.

## **INFORMATION HANDLING**

This policy is to set out how we collect, use, disclose, hold and store personal information while delivering on our football, food, beverage and entertainment services

## Information Collection

Aspley Hornets Football Club collects information that is reasonably necessary for us to provide your membership, employment or participation in our football club.

Personal information including taxation records, criminal/blue card checks and banking information. The information we collect and hold generally includes name (and satisfactory evidence of identity), supply address, address and contact details (such as phone number(s), fax number and/or email address).

However, we may also collect and hold other information and photos required to provide services or assistance to you, for marketing and promotions and also employment purposes. We will always check with the owner of the information or their guardian before any photos or promotional material will contain your photo or information.

## How we collect information

Information can be collected in various ways including hard copy forms or email.

There may be some occasions where we collect your information from someone else. This may include authorised representatives, our contracted service providers, agents or related entities and/or anyone you have authorised to deal with us on your behalf.

On all occasions, information is collected, held, used and disclosed by us in accordance with this policy and the *Privacy Act 1988 (Cth)*. We may also seek to collect information about someone else from you (for example, a reference check for employment). Similarly you must not provide us with information about another person unless you have clear consent from that person to do so and let them know about this Privacy Policy, and where to find it.

## How we use information

Aspley Hornets Football Club will only use your information for the purpose for which it was provided to us, related purposes that you would reasonably expect and as permitted or required by law.

### Such purposes include:

- Responding to inquiries, complaints and claims in relation to the clubs services.
- Complying with our obligations under any contract applicable law;
- Processing survey or questionnaire responses for the purpose(s) notified in the survey or questionnaire (if you have chosen to participate in such);
- For market research so that we can better understand our customers' needs and tailor our future products and services accordingly;
- Providing with marketing information regarding products and services;
- Reporting to our board:
- Quality assurance and training purposes; and
- Any other purposes identified at the time of collecting your information

## Disclosure of information

We will only disclose your sensitive information for the purposes for which it was initially collected, other directly related purposes or purposes to which you consent.

Disclosure of information may occur to our related entities and third parties who provide services to us or on our behalf, including:

- In the case of some claims (or likely claims), assessors, repairers, builders, and investigators; Government bodies, regulators, law enforcement agencies and any other parties where required by law.

## Security of information

Aspley Hornets Football Club will take reasonable steps (including any measures required by law) to ensure your information is protected and secure. For any payments you make via our websites, we use a recognised payment service providers that are required to take reasonable steps to protect your information. We also take reasonable precautions to ensure that any information you provide to us through our websites is transferred securely from our servers to our mainframe computers. However, no data protection and security measures are completely secure. Despite all the measures we have put in place, we cannot guarantee the security of your information, particularly in relation to transmissions over the internet. Accordingly, any information which you transmit to us is transmitted at your own risk. You must take care to ensure you protect your information (for example, by protecting your usernames and passwords, customer details, etc.) and you should notify us as soon as possible after you become aware of any security breaches.

## Accuracy, access and correction

Our football Department and Club operations take reasonable steps to ensure the information we collect and hold about you is accurate, up-to-date and complete, and if used also ensure personal information disclosed is accurate, up-to-date, complete and relevant.

Reasonable steps to ensure the accuracy of information collected by the Aspley Hornets Football Club will include:

- Ensuring updated or new personal information is promptly added to relevant existing records;
- Reminding individuals to update their personal information each time your organisation engages with the individual; and
- Contacting the individual to verify the quality of personal information when it is used or disclosed, particularly if there has been a lengthy period since collection.

Please let us know as soon as possible if there are any changes to your information or if you believe the information we hold about you is not accurate, complete, up-to-date or is otherwise misleading.

We will, on request, provide you with access to the information we hold about you unless we are prohibited by law from doing so. We will notify you of the basis for any refusal to allow you access your

information. We may ask you to complete a written request for this information. If we are required to contact your doctor we will always ask for express permission and to sign a written consent.

## Requests or complaints

If you have any requests or complaint relating to our Privacy, please contact us using the contact details below. Our Privacy Officers will ask you to fill out an incident report form. You will need to provide us with sufficient details regarding your complaint, as well as any supporting evidence and/or information.

We will refer your inquiry or complaint to our Privacy Officers as mentioned above in responsibilities section of this policy. They will, within a reasonable time, investigate the issue and determine the steps that we will undertake to resolve any complaints. We will contact you if we require any additional information from you and will notify you in writing of the response or determination of our Privacy Officers.

## Revision of our Privacy Policy

We may revise this Privacy Policy or any part of it from time to time. Please review this policy periodically for changes. If we make significant changes to this policy, we may notify you using the contact details provided by you or by putting a notice on our website and through our internal mail. Your continued use of our website, services, requesting our assistance or the provision of further personal or sensitive information to us after this Privacy Policy has been revised, constitutes your acceptance of the revised Privacy Policy.

## How to contact us

If you have any questions or concerns about this Privacy Policy, please email us at [hr@aspleyhornets.com.au](mailto:hr@aspleyhornets.com.au) or call us on 07 3263 5522.

## Online Security Statement

Our Privacy Policy contains details about how we collect, use and disclose your personal information generally. Our Online Security Statement provides additional security information about how we ensure the security of your personal information when you deal with us online.

When you use our website and when you transact with us online, you may provide us with some of your personal information. We are committed to protecting this personal information in accordance with the *Privacy Act 1988 (Cth)*.

## Internet Security Statement

Information not capable of identifying persons, such as the number of users visiting this website, is collected through code embedded in the WebPages of this website. Other information, such as browser type, is included in a 'cookie' that is sent to a persons' computer when they complete certain tasks on our website. A cookie contains bits of information that enables our servers (i.e. the computers that house this website) to identify and interact efficiently with your computer. Cookies are designed to provide a better, more customised website experience, and to make it easier to use our website. Individuals can configure

their browser to either accept all cookies, reject all cookies or to notify them when a cookie is being sent to their computer. The 'help function' on your browser will provide them with details on how to change their browser configurations.

No data transmission over the internet can be guaranteed as totally secure. Whilst we strive to protect such information, we do not warrant and cannot guarantee the security of information which you transmit to us. Accordingly, any information which you transmit to us is transmitted at your own risk. SPAM means unsolicited advertising material sent via email. We will not send out this type of material. All our subscribers will be able to opt out of our direct marketing and we will not share our customer or membership base with other marketing or advertising third parties.

## **What is our privacy relationship with third party websites?**

Third party websites eg. Sticky Tickets are not subject to this Online Security Statement. We recommend that you read their online privacy and security statements to understand how they deal with your personal information online.

## **Contact us**

If you have any questions relating to this online security statement, please contact us using the details set out in our Privacy Policy on our website [www.aspleyhornets.com.au](http://www.aspleyhornets.com.au)

## **REFERENCES**

*Privacy Act 1988 (Cth)*

*Information Privacy Act 2009 (QLD)*

*Australian Privacy Principles Guidelines* [www.oaic.gov.au](http://www.oaic.gov.au)

*Working with Children (Risk Management and Screening) Act 2010*