

Waverley Hockey Club – Data Privacy Policy & Procedures

Purpose

To set out the way in which WHC collects, uses and discloses personal information and explains your rights and how to contact WHC. WHC is committed to protecting your personal information in accordance with Privacy Act 1988 (Cth) and the Health Records Act 2001 (Vic).

1. Waverley Hockey Club

Waverley Hockey Club (**WHC**) is a community hockey club in Ashwood. This Policy applies to WHC and its members.

2. About this policy

- 2.1 This Policy sets out the way in which WHC collects, uses and discloses personal information and also explains your rights and how to contact WHC. WHC is committed to protecting your personal information in accordance with Privacy Act 1988 (Cth) and the Health Records Act 2001 (Vic). Please read the text carefully.
- 2.2 We may modify or update this Policy from time to time by publishing a new version of the Policy on the WHC network of websites (any related websites, mobile websites or applications which link directly to this Policy (collectively, the *WHC Sites*)). We will indicate any changes by updating the date of this Policy. If you have any questions about this Policy, please contact the WHC Privacy Officer using the details in section 12.

3. Summary

- 3.1 WHC may collect, use, hold and disclose personal information that we collect from you or from third parties for a variety of purposes, including to provide or promote our services to you (see sections 4-6). You can opt-out of receiving marketing materials from WHC at any time by utilizing the unsubscribe feature on any electronic marketing communications that you receive, or in the case of other direct marketing materials by contacting the WHC Privacy Officer in accordance with section 12.1 below.
- 3.2 WHC may disclose your personal information to third parties in the course of our operations, including to other hockey organisations such as Hockey Victoria.
- 3.3 WHC may collect information in relation to your use of our websites, including through the use of cookies. Such information may be used to optimise or maintain our website, as well as for advertising purposes (see section 8).
- 3.4 WHC takes reasonable steps to protect the personal information that we hold. This includes using password-protected systems to store personal information (see section 9).
- 3.5 You have a right to access and/or correct personal information that WHC holds about you, or to make a complaint about our handling of your personal information. You can do



so by contacting the WHC Privacy Officer using the details set out at the end of this Policy (see sections 10 and 12).

4. What kinds of information do we collect?

- 4.1 In the course of its operations, WHC may collect, use and disclose the personal information of players, administrators, participants and other individuals for the purpose of governing and administering of WHC, as described in this Policy. The precise nature of the collection, use and disclosure of personal information by WHC depends on the services you request and receive from, and your interaction with, WHC.
- 4.2 Personal information collected and held by WHC may include your name, address, phone numbers, email address, date of birth, gender, occupation and social media details.
- 4.3 Depending on the services you receive from WHC, we may also collect and hold details about your participation history, membership history as well as your emergency contact information, credit card information, driver's license details, reference check information and details of items ordered or purchased from WHC.
- 4.4 In certain circumstances, WHC may collect information about your health or other sensitive information about you (for example, information about your racial or ethnic origin or physical health). WHC may use health information about you to ensure that hockey programs in which you participate are run safely and in accordance with any special health needs you may have and for insurance purposes. WHC may also use health information as required by the WHC, including medical and anti-doping testing and investigations.
- 4.6 If you choose not to provide certain personal information, WHC may not be able to communicate with, or provide services to, you. For example, you may not be able to register to play hockey or participate in some of the activities on the WHC Sites if you do not provide certain personal information.

5. How do we collect and hold your personal information?

- 5.1 We may collect your personal information from you or from a third party.
- 5.2 The personal information could include:
 - Registration data: including, but not limited to, name, birth date, contact details, age, gender, medical information, team signing up to play for, interest in volunteering;
 - Volunteer data: including, but not limited to, name, contact details, Working With Children Check number & expiry date, Police Check, other accreditations such as umpiring or coaching, bank account details to facilitate payment of volunteer levy refund and umpire payments; or
 - Other data including images and video recorded at matches, training of WHC events.



- 5.3 For example, WHC may collect personal information from you:
 - I. via the WHC Sites;
 - II. when you provide it to WHC by filling in forms approved by WHC from time to time (including when you register for membership). WHC's registration form is managed via the Hockey Victoria RevSport system. During the registration process the member provides permission for their data to be utilised by both Hockey Victoria and WHC. Where the member is a minor this consent is signed by the parent or guardian.
 - III. when you contact WHC;
 - IV. when you engage with WHC via social media;
 - V. when you subscribe to receive hockey related newsletters or other information; or
 - VI. when you enter a competition that is being conducted by, or on behalf of, Hockey Victoria or WHC
- 5.4 WHC may also collect personal information about you from third parties, including:
 - Hockey Victoria, club and/or a competition administrator registered with WHC from time to time (Hockey Administrators);
 - II. your representatives or agents;
 - III. WHC corporate partners, licensees, sponsors, suppliers and broadcasters (WHC Partners);
 - IV. vendors, when you purchase hockey related merchandise; and
 - V. the organisations identified under section 7 below.
- 6. For what purposes do we collect, hold, use and disclose your personal information?
- 6.1 WHC may collect, hold, use and disclose your personal information for various purposes, including:
 - I. to verify your identity;
 - II. registration for hockey competitions or matches;
 - III. payment of fees or levies;
 - IV. communication with coaches or administration volunteers in relation to injuries or medical conditions that may be relevant to your participation in events, including matches and trainings, at WHC;



- V. to ensure compliance with WHC policies and procedures, including the administration and development of hockey;
- VI. to organise, conduct and promote hockey competitions, matches, programs and other events (including for the purpose of distributing newsletters, providing information and making ticket offers);
- VII. to develop programs, activities, events, products, services and merchandise relating to hockey;
- VIII. to provide you with information about our products and services, including information about tickets, merchandise and special offers, or which we reasonably believe may be of interest you;
 - IX. to investigate and take action in the event that applicable laws or regulations are breached, including terms of admission and codes of conduct;
 - X. to carry out market research and surveys;
 - XI. to contact you if you win a prize in a competition you have entered and to send the prize to you;
- XII. to administer, manage and improve the WHC Sites and to provide you with, or optimise your, access to those WHC Sites;
- XIII. so that WHC can provide you with direct marketing communications in relation to products, services, tickets, merchandise and special offers made available by WHC or our WHC Partners that we think will be of interest to you. You will be able to opt-out of receiving direct marketing communications from WHC 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 WHC Privacy Officer in accordance with section 12.1 below;
- XIV. where permitted by WHC, to enable WHC Partners who have a relationship with WHC to market and promote their products and services to you. You will be able to opt-out of WHC disclosing your personal information to WHC Partners for the purposes of direct marketing at any time if you so choose, by utilising the unsubscribe feature on electronic marketing
- XV. de-identified health information and other sensitive information, including individual's racial or ethnic origin, may be used to carry out research, to prepare submissions to Council or government, or to plan events and activities;
- XVI. communications, or in the case of other direct marketing materials by contacting the WHC Privacy Officer in accordance with section 12.1 below; and
- XVII. for any use that is reasonably apparent at or around the time the information is collected or that is otherwise notified to you from time to time.



6.2 We may collect, use or disclose information about you in order to combine the information that we hold about you with information about you collected from or held by other trusted partners or from public sources. We do this in order to enable the development of consumer insights about you so that we and those other trusted companies can serve you better. This includes being able to better understand your preferences and interests, personalise your experience, enhance the products and services you receive, and to tell you about products and services. We may also use trusted service providers to undertake the process of creating these consumer insights.

7. To whom do we disclose your personal information?

- 7.1 We may disclose your personal information for the purposes described in this Privacy Policy to:
 - a Hockey Administrator that you have registered with or expressed an interest in, which may then use your personal information to administer the game of hockey and keep you updated with information about them.
 - II. WHC's related bodies corporate;
- III. Hockey Victoria or Hockey Australia;
- IV. the Australian Sports Anti-Doping Authority, Australian Institute of Sport, Victorian Institute of Sport and/or Australian Olympic Committee;
- V. WHC's insurers;
- VI. WHC's professional advisors, including our accountants, auditors and lawyers;
- VII. third party service providers, suppliers and partners, such as ticketing agents;
- VIII. government agencies, regulatory bodies and law enforcement agencies, or as required, permitted or authorised by law or where we have a public duty to do so, including for purposes of safety and security; and
 - IX. where you have consented to your personal information being disclosed to others;
 - X. anyone to whom our assets or businesses (or any part of them) are transferred; and
 - XI. specific third parties authorised by you to receive information held by us.
- 7.2 WHC Partners or Hockey Administrators may have separate privacy policies which apply to their collection, use and disclosure of your personal information. You should refer to that privacy policy for further details, including how you can contact the relevant WHC Partner or Hockey Administrator if you have any queries, or wish to make a complaint, about their handling of your personal information.



8. Using a WHC Site

- 8.1 If you visit a WHC Site, WHC may record information such as your Internet Protocol (IP) address, browser type, Internet Service Provider (ISP), referring/exit pages, operating system, the WHC Site 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 WHC Sites and to gather demographic information about WHC users collectively.
- 8.2 Like many other websites, the WHC Sites may use 'cookies' from time to time. A cookie is a piece of data that allows us to identify and interact more effectively with your device. The cookie helps WHC to maintain the continuity of your browsing session and remember your details and preferences when you return. You can configure your web browser to reject cookies however some parts of our website may not have full functionality in that case.
- 8.3 When we send you emails or other electronic messages, WHC may record where you open the message and click on particular links. This helps us to better understand what information is of interest to you.

9. Protecting your personal information

- 9.1 WHC takes the security of personal information seriously. WHC has appointed a Privacy Officer to oversee WHC's management of personal information in accordance with this Policy and the Privacy Act 1988 (Cth).
- 9.2 WHC uses a number of physical, administrative, personnel and technical measures to protect the security and privacy of your personal information. For example, all electronic data that is held by WHC is stored on password protected systems.
- 9.3 If you are considering sending us any other personal information through a WHC Site or other electronic means, please be aware that the information may be insecure in transit, particularly where no encryption is used (e.g. email). Any transmission is therefore at your own risk.
- 9.4 Where WHC has given you (or where you have chosen) a password which enables you to access certain parts of an WHC Site, you are responsible for keeping this password confidential. WHC suggests that you do not share the password with anyone and to change it regularly.
- 9.5 Information is stored electronically in the following locations and access is managed as outlined:
 - I. RevSport system: System access is password protected. The Registrar is responsible for ensuring only relevant committee members and volunteers have access to this system, this will include Unit Committees and Team Managers. Access levels are reviewed and updated regularly.



- II. Google drive: The Secretary is responsible for ensuring only relevant committee members and volunteers have access to each folder and access levels are reviewed and updated regularly.
- III. Survey Monkey system: System access is password protected. The Communications Director is responsible for ensuring only relevant committee members and volunteers have access to this system. Access levels are reviewed and updated regularly.
- IV. Mailchimp newsletter system: System access is password protected. The Communications Director is responsible for ensuring only relevant committee members and volunteers have access to this system. Access levels are reviewed and updated regularly.
- V. Emails of individual committee and volunteer members which are stored on password protected email servers.

Access to a system and / or data will only be granted for the period of time that the Committee member / volunteer requires this information to undertake their duties to the Club.

10. How can you access and correct your personal information?

- 10.1 WHC takes reasonable steps to ensure the personal information that WHC collects, uses and discloses is accurate, complete and up-to-date. However, the accuracy of that information depends on the information you provide.
- 10.2 You have the right to access the personal information we hold 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 WHC Privacy Officer to submit an enquiry to access the personal information WHC holds about you. The WHC Privacy Officer's contact details are set out in section 12.
- 10.3 If you provided your personal information via a WHC Site, you can also update that information at any time by logging onto the relevant WHC Site and submitting the updated information.

11. Can you opt out of direct marketing communications?

You can opt out of receiving marketing messages from WHC at any time by following the unsubscribe instructions on electronic marketing communications, or in the case of other direct marketing materials, by contacting the WHC Privacy Officer in accordance with section 12.1 below.

12. Contacting the WHC Privacy Officer and Making Complaints

12.1 You may contact the WHC Privacy Officer by writing to privacy@waverleyhc.org.au



12.2 You may complain about our collection, use or disclosure of your personal information by contacting the WHC Privacy Officer using the contact details above with your full name and contact details, together with a detailed description of the complaint. We will respond to your complaint within a reasonable period of time and inform you of the next steps we will take in dealing with your complaint. If we are unable to resolve your complaint, we will inform you of the further steps you can take.