



Club Procedure MARGOV002

Privacy Policy

Endorsement Date:	9 th November 2020
Guideline Topic:	Privacy Policy
Guideline Number:	MARGOV002
Document Version Control:	Draft 1.0

1. Purpose and Background

1.1 The protection of personal information is important to the Marcoola Surf Life Saving Club (**Club**). The Club is committed to respecting the right to privacy and the protection of personal information.

2 Policy/Procedure Statement

2.1 This document sets out:

- What personal and sensitive information the Club collects;
- How the Club collects personal and sensitive information;
- How the Club uses or discloses personal and sensitive information;
- How individuals can access or seek correction of information held by the Club; and
- Who to contact regarding privacy issues and complaints.

3. Applicability:

3.1 To all Club members.

4. Statutory/Constitution/By-Laws Requirements

4.1 Constitution clauses 15.2, 15.3 and 15.4. Privacy Provisions of Queensland and Commonwealth Legislation apply through numerous acts.

5. Considerations

5.1 By providing your personal information to the Club, you consent to its use, storage and disclosure in accordance with this Privacy Policy. This Policy provides for the way in which the Club, may collect, use, store and disclose information.



- 5.2 Third party commercial entities and subsidiaries, whether owned or acting on behalf of the Club or not, may be subject to the same privacy laws and may be governed by their own privacy policies. The Club will always do its utmost to ensure that personal information is respected and protected.

6. Procedures

6.1 What personal and sensitive information do the Club?

Personal Information

Generally, personal information is information or an opinion (including information or an opinion forming part of a database) from which it is possible to determine someone's identity.

The information collected by the Club about a particular person will vary depending on the circumstances of collection. It may include, but is not limited to:

- A person's contact details (name, email and/or postal address, phone number), date of birth, gender;
- Credit card details, driver licence number, passport number, insurance details; and
- Employment history, qualifications or communication history with the Club and SLSA.

Sensitive Information

Sensitive information is a type of personal information that also includes information or an opinion about:

- Racial or ethnic origin;
- Political opinions;
- Membership of a political association, professional or trade association or trade union;
- Religious beliefs or affiliations or philosophical beliefs;
- Sexual preferences or practices;
- Criminal record; or
- Health, genetic information or disability.



If it is reasonably necessary in the circumstances, the Club may also collect sensitive information such as a person's medical history, nationality, and their ethnic background or disabilities.

The Club is required by law to obtain consent when collecting sensitive information.

The Club will assume consent to the collection of all sensitive information that is provided to it for use in accordance with this Privacy Policy, unless told otherwise.

6.2 How does the Club collect personal and sensitive information?

Information may be collected when you:

- Become a member of the Club;
- Subscribe to any publication of the Club, including electronic publications;
- Provide details to the Club in an application form, consent form, survey, feedback form or incident report;
- Enter personal information into, or agree to having your personal information entered into, one of SLSA's online systems such as 'Surf Guard' or another SLSA online system, or the Club's standalone data base;
- Access the SLSA website or the Club's data base;
- Access any of the Club's social media platforms;
- Contact the Club via email, telephone or mail or engage with the Club via social media;
- Participate in any program, activity, competition or event run by the Club or SLSA;
- Purchase tickets to a surf lifesaving or sporting event from the Club or an authorised agent;
- Purchase merchandise, products or services from the Club or an authorised agent or licensee;
- Are elected or appointed to the Board or a committee of the Club;
- Apply for employment or a volunteer position with the Club; or
- Where the Club is required to do so by law (for education, VET training, child protection, Work health and safety laws, AVETMISS, charitable collections, Good Samaritan, Medical Treatment or other legislation in Australia).



Providing information

Depending on the circumstances, some types of information will be required and others might be optional. If members do not provide some or all of the information requested, this may affect the Club's ability to communicate with the member or provide the requested products or services.

By not providing requested information, members may jeopardise their ability to participate in programs, competitions or apply for employment or volunteer positions with the Club or the Club's Affiliate. If it's impracticable for the Club to deal with a member as a result of the member not providing the requested information or consents, the Club may refuse to do so.

Collection from third parties

The Club or an Affiliate of the Club may collect personal information regarding a child from the parent or other responsible person associated with that child.

In some circumstances, the Club collects information from an Affiliate of the Club or other third parties.

Examples of such third parties could include, without limitation, the Australian Institute of Sport, the Australian Olympic Committee, non-affiliated surf lifesaving organisations, education organisations or government and law enforcement bodies.

Information storage and protection

The Club stores information in different ways, including in paper and electronic form. Much of the information the Club collects from and about our members is added to the SLSA 'Surfguard' database which is hosted by a third party data storage provider. When member's information is entered into the Surfguard database, the information may be combined or linked with other information held about that member.

Security of personal information is important to the Club. The Club has taken steps to protect the information it holds from misuse, loss, unauthorised access, modification or disclosure. Some of the security measures the Club and SLSA uses includes strict confidentiality requirements of our employees, volunteers, and service providers, as well as security measures for system access, and security measures for the Club's website such as firewalls and system encryption.



6.3 How does SLSA use and disclose personal and sensitive information?

Use

The Club and third parties, to whom we may disclose personal information in accordance with this Privacy Policy, may use your personal information to:

- Verify your identity;
- Complete background checks;
- Research, develop, run, administer and market competitions, programs, activities and other events relating to a variety of surf lifesaving sports and activities including but not limited to 'Nippers', 'Rescue and Resuscitation' events, Ironman and Ironwoman competitions, emergency management information, membership management, education offerings and organisation, social events, police or other legal agencies for the purposes of medical treatment amongst others;
- Research, develop and market products, services, merchandise and special offers made available by us and third parties;
- Respond to emergency situations involving or requiring medical treatment;
- SLSA on behalf of the Club administers, manages and provides you with access to sls.com.au , 'Surfguard' database, self-service portal and other IT based applications;
- The Club administers, manages and provides you with access to our social media sites;
- Keeps you informed of news and information relating to various surf lifesaving events, activities and opportunities via various mediums.

SLSA in conjunction with the Club may use health information to ensure that programs operated are run safely and in accordance with any special health needs participants may require. Health information may also be kept for insurance purposes. In addition, the Club may use de-identified health information and other sensitive information to carry out research, to prepare submissions to government or other regulatory bodies, or to plan events and activities.



Disclosure

The Club may disclose a member's personal information to a range of organisations, which include, but are not limited to:

- The Club's Affiliates and other organisations involved in surf lifesaving and emergency management;
- Companies we engage to carry out functions and activities on the Club's behalf, including direct marketing;
- Our professional advisers, including our accountants, auditors and lawyers;
- Our insurers;
- SLS companies, subsidiaries and affiliates;
- Relevant sporting bodies such as the Australian Sports Commission, the Australian Sports Anti-Doping Authority, the Australian Olympic Committee, the Australian Paralympic Committee, the Australian Commonwealth Games Association, Australian Institute of Sport, Australian Sports Anti-Doping Authority, various National Sporting bodies, Federal and State Departments of sport amongst others; and in other circumstances permitted by law and Education Bodies.

In some circumstances, personal information may also be disclosed outside of Australia. In such circumstances, the Club will use its best endeavours to ensure such parties are subject to a law, binding scheme or contract which effectively upholds principles for fair handling of the information that are suitably similar to the Australian Privacy Principles.

Direct marketing

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

Every person whose data is collected by SLSA or the Club has the option to refuse e-mail, SMS or posted offers. Members may do this by updating the direct marketing settings in your user portal/Life Saving Online in Surfguard, or via the opt-out procedures included in any communication from us (information relating to the option to unsubscribe from those communications may be retained).



If you are still not satisfied at the communication you are receiving, you can also write to the SLSA's Privacy Officer via the contact details set out below or for Club information to the Administrator of the Marcoola Surf Lifesaving Club at administrator@marcoolasurfclub.com.au

Other disclosures

In addition, the Club may also disclose personal information:

- With a member's express or implied consent;
- When required or authorised by law;
- To an enforcement body when reasonably necessary; or
- To lessen or prevent a threat to an individual or public health or safety.

The Club's Website

When users visit the Club's website, our systems may record certain information about their use of the site, including the web pages visited and the time and date of their visit. The Club uses this information to help analyse and improve the performance of the Club's website.

In addition, the Club may use "cookies" on the Club's website. Cookies are small text files that help a website to remember the preferences of users to improve the experience of using that website. In some cases, the cookies that the Club use may collect some personal information. The Club will treat this information in the same way as other personal information it collects. Members are free to disable cookies on your Internet browser to prevent this information being collected; however, you may lose the benefit of an enhanced website experience that the use of cookies may offer.

Websites linked to the Club's website are not subject to Club's privacy standards, policies or procedures. The Club does not take any responsibility for the collection, use, disclosure or security of any personal information that you provide to a third party website.

- 6.4 Accessing and seeking correction of information held by the Club. The Club will take all reasonable steps to ensure that the personal information it collects uses or discloses is accurate, complete and up-to-date. However, the Club relies on the accuracy of personal information as provided to it both directly and indirectly.



- 6.5 The Club also relies on Affiliates and volunteers to enter data and make their best endeavours to ensure data is accurately recorded. The Club encourages all users to regularly review and update their personal information on the

Surfguard database and via the “members portal” link. Individuals may also request access to their personal information held by SLSA by making a request via the contact details set out below. SLSA will respond to a member’s request for access within 14 days and endeavours to provide the requested information within 30 days. If a member finds the personal information SLSA holds is inaccurate, incomplete or out-of-date, contact SLSA immediately and they will see that it is corrected.

- 6.6 Information held by the Club, individuals may also request access to their personal information held by the Club. The Club will respond to the member’s request for access within 14 days and endeavour to provide the requested information within 30 days. If a member finds the personal information the Club holds about them is inaccurate, incomplete or out-of-date, contact the Club immediately and they will see that it is corrected.

- 6.7 The Club - Resolving privacy issues and complaints any issues or complaints in relation to the collection, use, disclosure, quality, security of and access to your personal information may be made to:

The Secretary
Marcoola Surf Club
64 – 76 Marcoola Esplanade
Marcoola QLD 4564

Email: administrator@marcoolasurfclub.com.au

Phone: (07) 5448 7311

- 6.8 SLSA - Resolving privacy issues and complaints any issues or complaints in relation to the collection, use, disclosure, quality, security of and access to your personal information may be made to the SLSA Privacy Officer at this address:

Privacy Officer
SLSA
Locked Bag 1010 Rosebery, NSW 2018
Email: privacy@slsa.asn.au
Phone: +61(02) 9215 8000



- 6.9 The Club will respond to a member's complaint within 30 days and try to resolve it within 90 days. If the Club is unable to resolve your complaint within this time, or the member is unhappy with the outcome, the member can contact the Office of Australian Information Commissioner via its enquiries line 1300 363 992 or website <http://www.oaic.gov.au> to lodge a complaint.
- 6.10 For further information on the Club's management of personal information, please contact the Marcoola Surf Life Saving Club. The Club may amend this Privacy Policy from time to time.

For further information on SLSA's management of personal information, please contact SLSA. SLSA may amend this Privacy Policy from time to time.

Authority

Peter Hourn
President