



## Club Circuit Policy Document

<b>Policy Title:</b>	<b>Privacy Policy</b>
<b>Policy Type:</b>	<b>Administration</b>
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<b>Approved:</b>	

### Updates to Policy

<b>Update No.</b>	<b>Approval Date</b>	<b>Nature of Amendment</b>	<b>Update Author</b>

## Scope

The Privacy Policy and associated procedures applies to the Club Circuit Committee, members and others working on behalf of Club Circuit.

## Purpose

Club Circuit respects the privacy rights of individuals participating in the sport of squash at venues where squash is played. Club Circuit recognises the responsibility to produce accurate statistics on the sport's participants to governments and to stakeholders.

This policy sets out the procedures of Club Circuit in relation to protecting the privacy of personal information provided by individuals. Club Circuit acknowledges that providing personal information is an act of trust. Club Circuit and its members will only use such information in accordance with the stated aims and in the manner specified in this policy.

### 1. Information

**Personal information** held on a player could include: name, address, phone number(s), email address, date of birth, participation details (past and present competitions played in) registration history, home club etc.

Data held on participants may be used for three primary purposes:

- **Statistics** - Personal information, in a form which has removed the ability to identify the individual, may be collated and used to produce statistics which will be supplied to government agencies as required and others agencies as necessary. They will also be used by Club Circuit for purposes of researching, developing and managing new and existing programs, for strategic and other planning, and for promoting the sport of Squash and/or the aims of Club Circuit.
- **Administration** - Personal information may be used for the purpose of communicating with participants about their membership and/or their involvement in programs, competitions and Club Circuit member activities.
- **Information.** Personal information may be used for the purpose of providing information to participants about matters pertaining to squash activities of Club Circuit and its sponsors. Any participant may request not to receive mail communications which do not directly relate to their participation in programs at a member club (e.g. direct marketing communications).

Player data will not be used for a purpose other than those specified above without the player's consent, except in circumstances related to public interest, law enforcement or public or individual health and safety.

## **2. Collection of Personal Information**

Club Circuit will, at all times, collect personal information in a fair, lawful and non-intrusive manner.

## **3. Use and Disclosure**

Club Circuit will not use or disclose personal information about an individual for a purpose (a secondary purpose) other than the primary purpose of collection unless one of the following applies:

1. both of the following apply:
  - the secondary purpose is related to the primary purpose of collection and, if the personal information is sensitive information, directly related to the primary purpose of collection; and
  - the individual would reasonably expect Club Circuit to use or disclose the information for secondary purposes; or
2. the individual has consented to the use of the disclosure; or
3. the information is not sensitive information and the use of the information is for the secondary purpose of direct marketing:
  - if it is impracticable for Club Circuit to seek the individual's consent before that particular use; and
  - Club Circuit will not charge the individual for giving effect to a request by the individual to Club Circuit not to receive direct marketing communications; and
  - if the individual has not made a request to Club Circuit not to receive direct marketing communications; and
  - in each direct marketing communication with the individual, Club Circuit draws to the individual's attention, or prominently displays a notice, that he or she may express a wish not to receive any further direct marketing communications; and
  - each written direct marketing communication by Club Circuit with the individual sets out Club Circuit's business address and telephone number; or
4. Club Circuit reasonably believes that the use or disclosure is necessary to lessen or prevent:
  - a serious and imminent threat to an individual's life, health or safety; or
  - a serious threat to public health or public safety; or
5. Club Circuit has reason to suspect that unlawful activity has been, is being or may be engaged in, and uses or discloses the personal information as a necessary part of its investigation of the matter or in reporting its concerns to relevant persons or authorities; or
6. The use or disclosure is required or authorised by or under law; or
7. Club Circuit reasonably believes that the use or disclosure is reasonably necessary for one or more of the following by or on behalf of an enforcement body:
  - the prevention, detection, investigation, prosecution or punishment of criminal offences, breaches of a law imposing a penalty or sanction or breaches of a prescribed law;
  - the enforcement of laws relating to the confiscation of the proceeds of crime;
  - the protection of the public revenue;
  - the prevention, detection, investigation or remedying of seriously improper conduct or prescribed conduct;
  - the preparation for, or conduct of, proceedings before any court or tribunal, or implementation of the orders of a court or tribunal.

#### **4. Data Quality**

Club Circuit will endeavour to ensure that personal information it collects is accurate, complete and up to date, however, we rely on the accuracy of personal information as provided to us both directly and indirectly.

#### **5. Data Security**

Club Circuit will ensure that all personal information it holds is protected from misuse, loss and unauthorised access, modification or disclosure. These reasonable steps could include the adoption of security passwords for access to electronic databases and physical security measures for paper based records.

Club Circuit will also take reasonable steps to destroy or de-identify personal information if it is no longer needed and it is no longer current.

#### **6. Data Availability**

Club Circuit has documented its policy on the management of personal information. This document is titled Club Circuit Privacy Policy and is available to anyone who asks for it. It is also recorded for public access on the Club Circuit website.

The general nature of personal information held, why it is held, how it is collected, held, used and disclosed, will be available to anyone on request.

#### **7. Access and Correction**

In general, Club Circuit will, subject to reasonable notice, provide a player with access to any personal information it holds about the player. If a player demonstrates that the personal information held is not completely accurate, the records will be amended to bring them up to date.

Personal information will not be given to a player if:

- providing access would pose a serious and imminent threat to the life or health of any individual; or
- providing access would have an unreasonable impact upon the privacy of other individuals; or
- the request for access is frivolous or vexatious; or
- the information relates to existing or anticipated legal proceedings between Club Circuit and the individual, and the information would not be accessible by the process of discovery in those proceedings; or
- providing access would reveal the intentions of Club Circuit in relation to negotiations with the individual in such a way as to prejudice those negotiations; or
- providing access would be unlawful; or
- providing access would be likely to prejudice an investigation of possible unlawful activity; or
- providing access would be likely to prejudice:
  - (1) the prevention, detection, investigation, prosecution or punishment of criminal offences, breaches of a law imposing a penalty or sanction or breaches of a prescribed law; or
  - (2) the enforcement of laws relating to the confiscation of the proceeds of crime; or
  - (3) the protection of the public revenue; or
  - (4) the prevention, detection, investigation or remedying of seriously improper conduct or prescribed conduct; or
  - (5) the preparation for, or conduct of, proceedings before any court or tribunal, or implementation of its orders; by or on behalf of an enforcement body.

Club Circuit may impose reasonable charges for providing access to personal information.

## **8. Anonymity**

Club Circuit will permit players the option of not identifying themselves when it is lawful and practicable to do so.

## **9. Transborder Data Flows**

Club Circuit will only transfer personal information to a recipient in a foreign country if:

- Club Circuit reasonably believes that the recipient of the information is subject to a law, binding scheme or contract which effectively upholds principles for fair handling of the information that are substantially similar to the National Privacy Principles; or
- the individual consents to the transfer; or
- the transfer is necessary for the performance of a contract between the individual and Club Circuit or for the implementation of pre-contractual measures taken in response to the individual's request; or
- the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the individual between Club Circuit and a third party; or
- all of the following apply:
  - (1) the transfer is for the benefit of the individual;
  - (2) it is impracticable to obtain the consent of the individual to that transfer;
  - (3) if it were practicable to obtain such consent, the individual would be likely to give it; or
- Club Circuit has taken reasonable steps to ensure that the information which it has transferred will not be held, used or disclosed by the recipient of the information inconsistently with the National Privacy Principles.

## **10. Changes to this Policy**

The Club Circuit Committee may amend this Policy from time to time to reflect changing business practices.

## **11. Implementation**

Enquiries concerning the implementation of this policy should be directed to the Club Circuit Secretary, email [husseymf@bigpond.net.au](mailto:husseymf@bigpond.net.au)