

<b>POLICY</b>	<b>Governance</b>
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AREA:	Corporate Services
RESPONSIBILITY:	Chief Operating Officer
DRAFTED BY:	Chief Executive Officer
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## 1. INTRODUCTION

The protection of personal information is important to Paddle Australia (PA), its Member States and Paddling Clubs (**Paddling Organisations**). Paddle Organisations are committed to respecting the right to privacy and the protection of personal information.

This document sets out:

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

By providing your personal information to a Paddling Organisation, you consent to its use, storage and disclosure in accordance with this Privacy Policy.

This Policy provides for the way in which Paddling Organisations may collect, use, store and disclose information. Third party commercial entities and subsidiaries, whether owned or acting on behalf of a Paddling Organisation or not, may be subject to the same or similar privacy laws and may be governed by their own privacy policies. Paddling Organisations will always do their utmost to ensure that personal information is respected and protected.

## 2. WHAT PERSONAL AND SENSITIVE INFORMATION IS COLLECTED?

### 2.1 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 a Paddling Organisation 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, employment history, qualifications or communication history with a Paddling Organisation.

### 2.2 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, a Paddling Organisation may also collect sensitive information such as a person's medical history, nationality, their ethnic background or disabilities.

Paddling Organisations are required by law to obtain consent when collecting sensitive information. Consent to the collection of all sensitive information that is provided for use in accordance with this Privacy Policy will be assumed, unless told otherwise.

### 3. HOW IS PERSONAL AND SENSITIVE INFORMATION COLLECTED?

Information may be collected when you:

- Become a member of a Paddling Organisation or other body which is a member or affiliated with a Paddling Organisation;
- Subscribe to any publication of a Paddling Organisation, including electronic publications;
- Provide details to a Paddling Organisation 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, the online system of any Paddle Organisation;
- Access a Paddling Organisation website;
- Contact a Paddling Organisation via email, telephone or mail or engage with a Paddling Organisation via social media;
- Participate in any program, activity, competition or event run by a Paddling Organisation;
- Purchase tickets to a Paddling Organisation event from a Paddling Organisation or an authorised agent;
- Purchase merchandise, products or services from a Paddling Organisation or an authorised agent or licensee;
- Are elected or appointed to the Board or a committee of a Paddling Organisation;
- Apply for employment or a volunteer position with a Paddling Organisation; or
- Where a Paddling Organisation is required to do so by law (for education, VET training, child protection, work Health and Safety Laws, medical treatment or other legislation in Australia).

#### 3.1 PROVIDING INFORMATION

Depending on the circumstances, some types of information will be required and others might be optional. If you do not provide some or all of the information requested, this may affect a

Paddling Organisation's ability to communicate with you or provide the requested products or services including membership services.

By not providing requested information, you may jeopardise your ability to participate in programs or competitions or apply for employment or volunteer positions with a Paddling Organisation. If it is impracticable for a Paddling Organisation to deal with you as a result of you not providing the requested information or consents, the Paddling Organisation may refuse to do so.

### 3.2 COLLECTION FROM THIRD PARTIES

A Paddling Organisation may collect personal information regarding a child from the parent or other responsible person associated with that child.

In some circumstances, a Paddling Organisation may collect information from other Paddling Organisations or other third parties. Examples of such third parties could include, without limitation, Sport Australia (including the Australian Institute of Sport) (**SA**), the Australian Olympic Committee (**AOC**), non-affiliated paddle organisations or government and law enforcement bodies.

### 3.3 INFORMATION ABOUT STORAGE AND PROTECTION

Information is stored in different ways, including in paper and electronic form. Much of the information collected from and about members is added to PA's database which is hosted by a third-party data storage provider. When your information is entered into this database, the information may be combined or linked with other information held about you.

Security of personal information is important to all Paddling Organisations. Paddling Organisations have taken steps to protect the information we hold from misuse, loss, unauthorised access, modification or disclosure. Some of the security measures used include strict confidentiality requirements of employees, volunteers, Paddling Organisations and service providers, as well as security measures for system access, and security measures for our website such as firewalls and system encryption.

Paddling Organisations are required to comply with the Federal Government Notifiable Data Breaches Scheme (NDBS). When a data breach occurs that could result in serious harm, the relevant Paddling Organisation will notify the individual(s) that are affected. The Paddling Organisation, when notifying the individual(s) and the Australian Information Commissioner, will also outline what steps will be undertaken in response to the breach. A review of the breach will be undertaken, and action(s) implemented to prevent a future breach.

## 4. HOW IS PERSONAL AND SENSITIVE INFORMATION USED AND DISCLOSED?

### 4.1 USE

Paddling Organisations, and third parties to whom personal information is disclosed in accordance with this Privacy Policy, may use your personal information to:

- (a) Verify your identity;
- (b) Complete background checks;

- (c) Research, develop, run, administer and market competitions, programs, activities and other events relating to a variety of paddle sports and activities including but not limited to events, competitions, membership information, membership management, education offerings and organisation, social events, police or other legal agencies for the purposes of medical treatment amongst others;
- (d) Research, develop and market products, services, merchandise and special offers made available by us and third parties;
- (e) Respond to emergency situations involving or requiring medical treatment;
- (f) Administer, manage and provide you with access to Paddling Organisation websites and other IT based applications; and
- (g) Keep you informed of news and information relating to various paddle events, activities and opportunities via various mediums.

Health information may be used to ensure that programs operated by a Paddling Organisation 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, de-identified health information and other sensitive information may be used to carry out research, to prepare submissions to government or other regulatory bodies, or to plan events and activities. Paddling Organisations will not use health information for the purposes of providing a Health Service as defined under the *Privacy Act 1988*.

## 4.2 DISCLOSURE

Paddling Organisations may disclose your personal information to a range of organisations including, but not limited to:

- Other Paddling Organisations;
- Companies engaged to carry out functions and activities on Paddling Organisations' behalf, including direct marketing;
- Professional advisers, including our accountants, auditors and lawyers;
- Insurers;
- Related companies, subsidiaries and affiliates; and
- Relevant sporting bodies such as the SA, the Australian Sports Anti-Doping Authority, the AOC, the Australian Paralympic Committee, the CGA, various National Sporting bodies, and Federal and State Departments of sport amongst others; and in other circumstances permitted by law.

In some circumstances, personal information may also be disclosed outside of Australia. In such circumstances, all Paddling Organisations will use their 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.

Any disclosure will be on such terms and conditions as PA determines, taking into account the circumstances of the disclosure but always with the best interests of the parties whose personal information is being disclosed.

### 4.3 DIRECT MARKETING

Your consent to use non-sensitive personal information to provide to you better services and marketing purposes (including disclosure of such information to service providers) is assumed.

Every person whose data is collected by a Paddling Organisation has the option to refuse e-mail, SMS or posted offers. You may do this by updating direct marketing settings (where available) 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 write to PA's Privacy Officer via the contact details set out below.

### 4.4 OTHER DISCLOSURES

In addition, a Paddling Organisation may also disclose personal information:

- (a) with your express or implied consent;
- (b) when required or authorised by law;
- (c) to an enforcement body when reasonably necessary; or
- (d) to lessen or prevent a threat to an individual or public health or safety.

### 4.5 WEBSITE

When users visit a Paddling Organisation website, the website systems may record certain information about their use of the site, including the web pages visited and the time and date of their visit. This information will be used to help analyse and improve the performance of the website.

In addition, some websites may use "cookies". 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 we use may collect some personal information. This information will be treated in the same way as other personal information collected. You 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 Paddling Organisations website are not subject to PA's privacy standards, policies or procedures. No responsibility is taken by any Paddling Organisation for the collection, use, disclosure or security of any personal information that you provide to a third-party website.

## 5. ACCESSING AND SEEKING CORRECTION OF INFORMATION HELD

All reasonable steps will be taken to ensure that the personal information collected, used or disclosed under this policy is accurate, complete and up-to-date. Paddling Organisations however, rely on the accuracy of personal information as provided to us both directly and indirectly.

Paddling Organisations rely on each other and volunteers to enter data and make their best endeavours to ensure data is accurately recorded.

All users are encouraged to regularly review and update their personal information provided to and/or stored with a Paddling Organisation.

Individuals may also request access to their personal information held by us by making a request via the contact details set out below. We will respond to your request for access within 14 days and endeavour to provide the requested information within 30 days. If you find that the personal information we hold about you is inaccurate, incomplete or out-of-date, please contact us immediately and we will see that it is corrected.

## 6. 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 Privacy Officer at this address:

Privacy Officer  
Paddle Australia  
PO Box 6805, Silverwater, NSW, 2128

We will respond to your complaint within 30 days and try to resolve it within 90 days. If we are unable to resolve your complaint within this time, or you are unhappy with the outcome, you 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.

For further information on PA's management of personal information, please contact PA.

PA may amend this Privacy Policy from time to time.