



ACA PRIVACY POLICY

VERSION 0.1

November 2018

Australian Croquet Association Inc
2/65 Tenant ST
FYSHWICK ACT 2609
ABN 90 330 745 920

RELATED POLICIES:

Member Protection Policy

RESPONSIBLE OFFICERS:

Complaints Officer

AUTHORITY:

Croquet Australia Board
Executive Officer

APPLICABLE FORMS:

APPROVED:

February 2019

NEXT REVIEW DATE:

1. Review History of Croquet Australia Privacy Policy

Version	Date reviewed	Date endorsed	Content reviewed/purpose
0.1	November 2018	February 2019	<ul style="list-style-type: none">• Document reviewed as part of a review of all ACA Policies which was conducted by Parbery Consulting.
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1. Introduction

The Australian Privacy Principles (APP) are the requirements that apply to Australian Government agencies in relation to handling personal information.

This Policy has been compiled in accordance with APP 1.3 and 1.4 and describes how the Australian Sports Commission (ACA) complies with the Privacy Act 1988 (Cth).

2. Purpose

The purposes for which the ACA collects, holds, uses and discloses personal information.

The ACA is the peak body for administration of the sport of croquet in Australia.

Its activities and services include:

- Overseeing administration of registered Croquet and Mallet Sports clubs across Australia
- Supporting participation and development
- Ensuring that the association is working under a best practice governance model.
- Seeking funding to support and promote the game
- Ensuring the protection of members and players of affiliated clubs

3. The kinds of personal information that the ACA collects and holds

In undertaking its activities, the ACA collects personal information. The personal information that the ACA holds will depend on the nature of the activity or service. It may include (but is not limited to) a person's name, contact details, date of birth, occupation, family background and financial records.

The ACA will only collect personal information to the extent relevant for the relationship it has with each person.

The ACA also holds sensitive personal information, for example about an employee or an athlete. This may include information about health, disability, racial or ethnic origin, criminal convictions, personnel files, employment histories and tax file numbers.

The Privacy Act places restrictions on collecting sensitive personal information about persons. The ACA may collect sensitive information when:

- providing health services to persons (for example to an athlete)
- it is required to provide specific services (for example in allocating specifically targeted funding)
- assessing eligibility for employment (potential or existing employees)
- for the purpose of maintaining the employee/employer relationship
- for the purpose of meeting legal employment obligations

If the ACA conducts online collaboration, social media or market research, it may also ask for public opinions about its services or staff. The ACA will treat these opinions as personal information in accordance with the APPs if they contain personally identifiable information.

4. How the ACA collects and holds personal information

If it is reasonable and practical to do so, the ACA will collect personal information directly from the persons concerned with their consent. This may be through application forms, over the telephone, the Internet, or in person.

The ACA may also need to collect personal information from other people or organisations. This information is collected with the person's consent, except for in circumstances allowed for by legislation. Sometimes this may happen without direct involvement. Some examples of the people or organisations from which the ACA may collect personal information about persons are:

- sporting organisations
- publicly available sources of information (such as telephone directories)
- person's representatives (such as a parent, coach, legal adviser, manager)
- person's employers
- other government agencies
- law enforcement agencies

So that the ACA can better tailor information and services to individual needs, when it sends email messages, it may use technology to identify persons to know when email is opened, or links used within an email.

The ACA may also hold or receive some information on cloud-based systems. Where this occurs, the relevant service will have been subject to an ACA risk assessment and be compliant with the privacy and security standards required by the ACA in protecting personal information.

5. When the ACA will not need to collect personal information

Depending on the nature of a person's relationship with the ACA, they may not need to personally identify themselves.

Persons generally have a right to pseudonymity or anonymity when dealing with the ACA, unless:

- the ACA is required or authorised by or under an Australian law, or a court/tribunal order to deal with individuals who have identified themselves;
- it is impracticable to deal with individuals who have not identified themselves; and
- the person is receiving a service or financial benefit from the ACA - which necessitates assurance that the service or monies is being directed to an identified person.

6. How the ACA will keep personal information accurate and up-to-date

The ACA seeks to maintain the quality of its information holdings by taking reasonable administrative and technical steps to make sure that the information collected, used and disclosed is accurate, complete and up-to-date.

7. How the ACA will keep information and data secure

Paper documents are protected from unauthorised access or use through the various security systems that we have over our physical premises. We also maintain up-to-date computer and network security systems with appropriate firewalls, access controls and passwords to protect electronic copies of personal information.

The only people who are allowed to handle or have access to personal information are those employees of the ACA and those who perform services for the ACA who need personal information to do their jobs. All employees of the ACA are bound by the ACA Code of Behaviour in the Member Protection Policy to not misuse personal information. Those who perform services on the ACA's behalf are also bound by agreements that include privacy clauses.

If we no longer require an individual's personal information, we will take reasonable steps to destroy it in a secure manner or remove identifying features from it. This is subject to any legal obligation (such as the Archives Act, 1983) that requires the ACA to keep information for a certain period of time.

8. In what circumstances would the ACA provide personal information to others

Sometimes the ACA may provide personal information to external organisations. Generally, these are organisations that help the ACA conduct its programs and activities. These organisations may include:

- sport partners (sporting organisations with whom we have agreements to provide funding or services)
- cloud based services that host ACA data on its servers
- authorised representatives of the ACA
- superannuation funds
- payment systems operators (for example, our online shop to receive credit card payments)
our accountants, auditors or lawyers
- person's representatives (for example a parent, coach, legal adviser, manager).

The ACA strives to limit the information it provides to outside organisations to what they need to provide their services to us - or to provide services to ACA clients. The ACA ensures that any organisation that it contracts with:

- meets the privacy standards required by the ACA in protecting personal information and complies with the Privacy Act 1988; and
- uses the personal information provided only for the purposes of the specific service being provided to the ACA, and for no other purpose.

The ACA may also need to provide personal information to others outside the ACA where:

- the information relates to a sports drug and safety matter or is otherwise relevant to the performance of the functions of the Australian Sports Anti-Doping Authority and as such may be provided to the Australian Sports Anti-Doping Authority
- the ACA is required to by law or has a public duty to do so. For example, a Court, a regulator (such as the Australian Taxation Office or the police can compel the ACA to disclose personal information to them)
- persons have expressly consented to their personal information being supplied to others for particular purposes.

9. Disclosure of ACA held personal information to overseas recipients

The ACA seeks to limit where possible the disclosure of personal information to overseas recipients.

The ACA may need to provide personal information to overseas recipients, where:

- the information relates to providing information to an international sporting organisation (for example the IOC, FINA, IAAF) for the purposes of administering or assisting sport and sporting competition
- the information relates to a sports drug and/or safety matter or is otherwise relevant to the functions of the World Anti-Doping Authority
- the information is provided in the management of travel or logistics for administering staff, athletes and teams
- a person has expressly consented to their personal information being supplied to overseas recipients.

10. Access to personal information held by the ACA and to correction of that information

Any person who believes that the ACA holds personal information about them may contact the agency to seek access to that information in accordance with APP 12.

If after accessing information held about any person, they consider that it is inaccurate, out-of-date, incomplete, irrelevant or misleading for the purposes for which it is held, then they may request the ACA to amend it in accordance with APP 13.

In the first instance a person can request access to their personal information by contacting the ACA.

By post: ACA Privacy Contact Officer
Australian Croquet Association
2/65 Tenant St
FYSHWICK
ACT 2609

By email: Croquet Australia croquet.australia@gmail.com

The ACA may not always be able to provide access to all the personal information it holds about a person. For example, it may not be able to provide access to information that would reveal personal information about another person. Any person may also obtain access to their personal information held by the ACA through the Privacy Act 1988 and the Freedom of Information Act 1982.

11. Complaints

The ACA will be efficient and fair when investigating and responding to any privacy complaints.

The ACA complies with the Guidelines published by the Australian Sports Commission and the Office of the Australian Information Commissioner in relation to complaints management.

Any privacy complaints received by the ACA must be in writing and will be initially investigated by the ACA Complaints Officer and will be escalated as required. The ACA will respond to all complaints within a reasonable time period appropriate to the specific complaint.

Any person may also complain to the Australian Information Commissioner who may investigate the ACA's actions. The Commonwealth Ombudsman may also investigate complaints about ACA actions. However, the Commonwealth Ombudsman and the Privacy Commissioner will consult to avoid the same matter being investigated twice.

12. ACA Website Privacy Statement

The Australian Croquet Association (ACA) is committed to protecting online privacy in accordance with Guidelines for Federal and ACT Government World Wide Websites issued by the Privacy Commissioner.

The ACA records visits to this website and logs the following information for statistical purposes:

- user's server or proxy address
- date/time/length of the visit
- files requested
- user's cookies
- user's searches

The information is used to analyse our server traffic. No attempt will be made to identify users or their browsing activities except where authorised by law. For example, in the event of an investigation, a law enforcement agency may exercise their legal authority to inspect the internet service provider's logs.

If you send us an email message we will record your contact details (in accordance with government record keeping standards). This information will only be used for the purpose for which you have provided it. We will not use your email for any other purpose and will not disclose it without your consent except where such use or disclosure is permitted under an exception provided in the Privacy Act.

When users choose to join a mailing list their details are added to that specific mailing list and used for the stated purpose of that list only. You will not be added to any mailing list without your consent.

As a user, you need to be aware of inherent risks associated with the transmission of information via the Internet. If you have concerns in this regard, the ACA has other ways of obtaining and providing information. Normal mail, telephone and fax facilities are available.

The ACA is not responsible for the privacy practices or the content of the linked web sites and the other pages hosted by the ACA on behalf of non-ACA agencies and organisations