



Privacy Policy

As at 14 October 2016

The Nunawading Swimming Club (NSC) recognises that it must obtain and use personal information in the course of providing programs and services. The protection of personal information is important to the Club and it is therefore committed to respecting individuals' privacy and to the protection of personal information.

This document sets out how NSC Swimming may collect, hold, use and disclose personal information. By providing your personal information to NSC Swimming, you consent to its use, storage and disclosure in accordance with this Privacy Policy.

This policy is made in accordance with the *Privacy Act 1988 (Cth)* and in particular the Australian Privacy Principles which came into effect on 12 March 2014.

This policy and any accompanying procedures may be amended from time to time by resolution of NSC's Board of Directors. The current version of this policy is available from the NSC website at www.nunawadingswimmingclub.com

This Policy applies to and binds all Relevant Persons and such other persons who use, access, provide or participate in Just Swimming programs, services, events and activities.

Why does NSC collect personal information?

NSC collects personal information in order to properly and efficiently carry out its functions, including to provide learn to swim programs, to provide club membership services, to conduct training services and to conduct and participate in competitions and events.

NSC uses or discloses personal information for the purposes for which the information was provided for directly related purposes including, where appropriate, to:

- establish or verify your identity;
- undertake employment processes and complete background checks;
- facilitate participation in programs, activities and events relating to Club and swim school membership;
- research, develop and market services, merchandise and special offers made available by us and by third parties;
- respond to emergency situations involving or requiring medical treatment;
- keep you informed of news and information relating to various swimming events, activities, promotions and opportunities via various media.

NSC also uses and discloses personal information where required or authorised by law.

You may ask to not identify yourself or disclose your personal information to NSC, or otherwise ask NSC to not use or disclose your personal information. However, doing so may limit the services NSC can reasonably provide to you. For example, NSC cannot reasonably

provide enrolment services to a person who wishes to participate but is not prepared to provide his or her name, address or contact details into a database system.

What information does NSC collect?

NSC routinely collects personal information about persons who enquire, enrol, apply, join, access or participate in NSC's information share, programs, services, events and activities.

a) Personal Information

The information NSC collects about you will vary depending on the circumstances of the collection. It may include, but is not limited to, your name, date of birth, gender, contact details, your photograph, your signature, your location, swimming results, insurance details, employment history, accreditations or any communication with NSC.

When you request or enrol in an NSC program or services from NSC, then NSC may collect personal information about you such as your program preferences, current health conditions and your bank account details.

The full details of the personal information NSC collects are found in the questions that NSC asks and in the forms you have completed during your involvement with NSC.

b) Sensitive Information

NSC may also need to collect a participant's sensitive information including medical contacts, medication being taken and diagnoses of specific conditions. NSC will only collect this information where required, where consent has been provided and where permitted by the *Privacy Act 1988* (Cth).

NSC may disclose a participant's sensitive information from time to time where it is applicable for the safety of the participant and where individual consent has been provided.

How is information collected?

Information may be collected from you when you:

- Become a member of the Nunawading Swimming Club via the Swimming Australia Membership portal;
- subscribe to any electronic publication of NSC;
- provide details to NSC in an enrolment, application, consent form, entry, survey, feedback form or incident report;
- enter personal information into, or agree to having your personal information entered into, one of NSC's online or offline information systems;
- access the NSC website or a website of a NSC linked Affiliate;
- contact NSC via email, telephone or mail or engage with NSC via social media;

- participate in any program, activity or event run by NSC;
- purchase merchandise, products or services from NSC or an authorised agent;
- are elected or appointed to the Board or a committee of NSC; or
- apply for employment or a volunteer position with NSC.

Personal information may also be collected where NSC is required to do so by law (including for education, child protection, work health and safety laws, medical treatment or other legislation in Australia).

Collection from third parties

In some situations, NSC may collect personal information about you from a third party such as your school, Swimming Victoria or Swimming Australia. NSC may also collect personal information from your family member (including where you are a minor or member of NSC under a family arrangement).

If NSC collects personal information about you from any other third party not mentioned in this Policy, then NSC will first endeavour to obtain your consent (unless such consent has already been provided). If that is not possible then NSC will only obtain the information from a third party if that is reasonably necessary for NSC to provide programs and services to you.

Where NSC receives personal information about you from a third party which was not solicited, then that information will be dealt with in accordance with this Policy and the *Privacy Act 1988* (Cth).

How does NSC store this information?

Subject to the use and disclosure provisions in this Policy, all of the personal information held by NSC about you is held on password-protected databases on servers located off-site or in secure files at the offices of NSC.

Only NSC personnel may access your personal information and even then only for one of the purposes permitted by this Policy.

Once NSC no longer has a need for your personal information then NSC will either destroy or de-identify the information when it is reasonably practicable to do so.

How does NSC disclose this information to Third Parties?

NSC may, from time to time, disclose your personal information to third party organisations which include, but are not limited to:

- companies we engage to carry out functions and activities on NSC's behalf;
- external service providers that provide NSC with financial, legal, administrative, information technology, banking, travel, uniform manufacturing, publications and other services;

- your agent or other form of representative (such as a family member where you are a minor or a member of a family where another family member has been nominated as your family's relevant point of contact);
- in other circumstances permitted by law.

Use and Disclosure

Direct marketing

NSC will use personal information that is not sensitive information to provide better services and for marketing purposes (including disclosure of such information to service providers). If you do not wish to receive e-mail, SMS or posted offers from NSC, you may opt-out by contacting the NSC Privacy Officer via the contact details set out in this policy.

Public and Media

NSC may also disclose your personal information (including your name, age, gender and photographs of you and your results) to the media and through the NSC digital applications and publications (including our website, social media, emails and newsletters) that are available for public viewing.)

NSC Website

NSC, through its website hosts, records visits to the website and logs the following information for statistical purposes: the user's server or proxy address, the date and time of the visit and the files requested. The information is used to analyse our server traffic. The NSC website is a cookie-free site, 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 its legal authority to inspect NSC's website logs.

Where a user of the NSC website provides NSC with information (including when communicating with NSC, subscribing to a newsletter or otherwise requesting information from NSC) then any personal information provided by the user shall be collected, used and disclosed in accordance with the Privacy Policy.

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

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

Accessing and seeking correction of information held by NSC

NSC will take all reasonable steps to ensure that the personal information it collects, uses or discloses is accurate, complete and up-to-date. However, we rely on the accuracy of personal information as provided to us both directly and indirectly. We encourage you to regularly update your personal information held by NSC.

If you would like to access the personal information that we hold about you, please let us know by making a request via the Privacy Officer, contact details set out below. 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 correct it.

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 NSC Privacy Officer at this address:

Privacy Officer
Nunawading Swimming Club
Fraser Place, Forest Hill, VIC 3131
Ph. (03) 9878 7055
Email: admin@nunawadingswimmingclub.com

We will respond to your complaint within a reasonable period, and try to resolve your complaint for you. If we are unable to resolve your complaint 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 NSC's management of personal information, please contact NSC.

Definitions

In this Policy the following words have the following meaning:

"Constitution and **"By-Laws"** respectively mean the Constitution and By-Laws of NSC.

"Privacy Officer" means the NSC employee who is responsible for overseeing Privacy for NSC. At present this is NSC's Chief Executive Officer.

"Members" means the members of NSC as defined in the Constitution.

"Personal Information" has the same meaning as in section 6 of the *Privacy Act 1988* (Cth).

"Policy" means this Privacy Policy.

"Relevant Person" means each of the Board members and officers of NSC, directors and officers of NSC Affiliates and Members, swimmers, coaches, event officials, employees, contractors, agents, consultants, volunteers, support services personnel, parents and any other person who agrees to be or is otherwise bound by this Policy.

"NSC" means Nunawading Swimming Club.

"NSC Affiliates" means the Affiliates of NSC as defined in the Constitution.

"Sensitive Information" has the same meaning as in section 6 of the *Privacy Act 1988* (Cth).

"You" means a person to whom this Policy applies and **"Your"** has a corresponding meaning.