

VAFAs Privacy Policy

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

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

1. WHAT PERSONAL AND SENSITIVE INFORMATION IS COLLECTED?

(a) 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 VAFAs 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 VAFAs.

(b) Sensitive Information

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

- (i) racial or ethnic origin;
- (ii) political opinions;
- (iii) membership of a political association, professional or trade association or trade union;
- (iv) religious beliefs or affiliations or philosophical beliefs;
- (v) sexual preferences or practices;
- (vi) criminal record; or
- (vii) health, genetic information or disability.

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

VAFAs is 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.

2. HOW IS PERSONAL AND SENSITIVE INFORMATION COLLECTED?

- (a) Information may be collected when you:
- (i) become a member of VAFA or other body which is a member or affiliated with VAFA;
 - (ii) subscribe to any publication of VAFA, including electronic publications;
 - (iii) provide details to VAFA in an application form, consent form, survey, feedback form or incident report;
 - (iv) enter personal information into, or agree to having your personal information entered into, any online system of VAFA;
 - (v) access any VAFA website;
 - (vi) contact VAFA via email, telephone or mail or engage with VAFA via social media;
 - (vii) participate in any program, activity, competition or event run by VAFA;
 - (viii) purchase tickets to an VAFA event from VAFA or an authorised agent;
 - (ix) purchase merchandise, products or services from VAFA or an authorised agent or licensee;
 - (x) are elected or appointed to the Board or a committee of VAFA;
 - (xi) apply for employment or a volunteer position with VAFA; or
 - (xii) where VAFA is required to do so by law (for education, or from a law enforcement agency request, child protection, work health and safety laws, medical treatment or other legislation in Australia).

(b) 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 VAFA'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 VAFA. If it is impracticable for VAFA to deal with you as a result of you not providing the requested information or consents, VAFA may refuse to do so.

(c) Collection from third parties

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

In some circumstances, VAFA may collect information from other third parties. Examples of such third parties could include, without limitation, AFL, Football

Victoria, other football and sport entities or government and law enforcement bodies.

(d) Information 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 VAFA'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 VAFA. VAFA has taken steps to protect the information it holds from misuse, loss, unauthorised access, modification or disclosure. Some of the security measures used include strict confidentiality requirements of employees, volunteers, VAFA and service providers, as well as security measures for system access, and security measures for VAFA's website such as firewalls and system encryption.

VAFA is required to comply with the Federal Government Notifiable Data Breaches Scheme (**NDBS**). When a data breach occurs that could result in serious harm, VAFA will notify the individual(s) that are affected. VAFA, 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.

3. HOW IS PERSONAL AND SENSITIVE INFORMATION USED AND DISCLOSED?

(a) Use

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

- (i) verify your identity;
- (ii) complete background checks;
- (iii) research, develop, run, administer and market events, competitions, programs, activities and other events relating to Amateur football including but not limited to membership information, membership management, education offerings and organisation, social events, police or other legal agencies for the purposes of medical treatment amongst others;
- (iv) research, develop and market products, services, merchandise and special offers made available by VAFA and authorised third parties;
- (v) respond to emergency situations involving or requiring medical treatment;
- (vi) administer, manage and provide you with access to VAFA websites and other IT based applications; and

- (vii) keep you informed of news and information relating to various Amateur football events, activities and opportunities via various mediums.

Health information may be used to ensure that programs operated by VAFA 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. VAFA will not use health information for the purposes of providing a Health Service as defined under the *Privacy Act 1988*.

(b) Disclosure

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

- (i) other Football entities such as AFL or Football Victoria;
- (ii) companies engaged to carry out functions and activities on VAFA's behalf, including direct marketing;
- (iii) professional advisers, including VAFA's accountants, auditors and lawyers;
- (iv) insurers;
- (v) related companies, subsidiaries and affiliates;
- (vi) law enforcement agencies; and
- (vii) in other circumstances permitted by law.

In some circumstances, personal information may also be disclosed outside of Australia. In such circumstances, VAFA 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.

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

(c) 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 VAFA 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 VAFA (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 VAFA's Privacy Officer via the contact details set out below.

(d) Other disclosures

In addition, VAFA may also disclose personal information:

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

(e) Websites

When users visit VAFA's 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 VAFA's website are not subject to VAFA's privacy standards, policies or procedures. No responsibility is taken by VAFA for the collection, use, disclosure or security of any personal information that you provide to a third-party website.

4. 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. VAFA however, relies on the accuracy of personal information as provided to it both directly and indirectly.

VAFA relies on members 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 VAFA.

Individuals may also request access to their personal information held by VAFA by making a request via the contact details set out below. VAFA 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 VAFA immediately and we will see that it is corrected.

5. 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
VAFA
PO Box 359, Elsternwick, VIC, 3185

VAFA will respond to your complaint within 30 days and try to resolve it within 90 days. If VAFA is 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 VAFA's management of personal information, please contact VAFA.

VAFA may amend this Privacy Policy from time to time.