



# Contents

1.	Introduction	2
2.	Collection of information	2
3.	Personal information	2
4.	Sensitive information	3
5.	Unsolicited information	3
6.	Anonymous information	3
7.	Method of collection	3
8.	Use of Information	3
9.	Disclosure	4
10.	Transfer of information outside Australia	5
11.	No sale of personal information	5
12.	Security	5
13.	Data quality, access, and correction	5
14.	Complaints about privacy and our complaint handling procedure	6
15.	Contact Privacy Officer	7
16.	Miscellaneous	7
17.	Further information on privacy	7



# 1. Introduction

At Pascoe Vale Football Club ("PVFC", "we", "us") your privacy is important to us. We are committed to protecting your privacy when managing your personal information. We have policies and procedures to ensure that all personal information is handled carefully and securely in accordance with the Australian Privacy Principles (APPs) contained in the *Privacy Act 1988 (Cth)* ("Privacy Act").

The purpose of this Privacy Policy is to tell you:

- a) What kind of personal information we may gather about you.
- b) How we may use that information and the choices you have regarding our use of such information.
- c) Whether we disclose your personal information to anyone.
- d) How you may inquire, access and/or seek correction of your personal information and our access and correction handling procedure.
- e) How you may alert us about an alleged breach of APPs and our complaint handling procedure.

#### 2. Collection of information

The types of information that PVFC collects from you will depend on the circumstances of collection and on the service that we are providing to you.

#### 3. Personal information

The type of personal information collected will be directly related to the specified purpose it has been collected for. How much of your personal information that you choose to disclose to us is completely up to you. The only way we know something about you personally is if you provide it to us. However, failure to provide certain information may result in PVFC being unable to provide you with the relevant product or service. We will make you aware of the purpose for which we collect the personal information and, where possible, the consequences of not providing it at the time of collection.

#### For example:

- a) If you request products or services from us, we may collect information such as your name and contact details (ie. billing and/or postal address, phone/fax number(s), or email address).
- b) If you sign up to use a particular service such as our newsletter(s) and enewsletter(s), mail outs, or enter a competition operated by us, we may collect information such as your date of birth and your interests and any other information required to provide that service to you (in addition to your name and contact details).
- c) If you participate in any surveys, we, or a third-party service provider acting on our behalf, may conduct from time to time on our website, personal information relating to your survey responses.



- d) If you make an inquiry, provide feedback, or make a complaint to us, we may collect your name and contact details.
- e) You acknowledge that the personal information we collect from you is your own information or information which you have been authorised to provide us.

#### 4. Sensitive information

PVFC does not generally collect sensitive information as defined under the Privacy Act, such as racial or ethnicity information, political opinions or associations, criminal records, or health information. However, subject to obtaining your prior consent, PVFC may collect sensitive information from you in the course of considering an application for membership such as information regarding medical conditions and health provider information.

#### 5. Unsolicited information

Where unsolicited information is received by PVFC (such as through our Facebook page or other social media platforms) we will determine, within a reasonable period of time, whether or not we would be permitted to collect the information under the APPs. If it would not be permitted for PVFC to collect the information, we will destroy the information or ensure it is de-identified as soon as practicable. Otherwise, PVFC may retain the information in accordance with the terms of this policy.

# 6. Anonymous information

We may also collect information about visitors to out website(s).

For example, we may collect:

- a) Statistical information about the number of visitors to the website(s) and the date, time and duration of the visits.
- b) The name of the domain/URL from which you access our website(s)
- c) The internet protocol address.

However, we do not collect information about the identity of the visitors unless they voluntarily provide that information.

#### 7. Method of collection

This personal information will only be collected through lawful and fair means and not in an unreasonably intrusive way.

PVFC collects your personal information when you deal with us directly, including via our website(s) or Facebook page, via forms or correspondence (ie. mail or email), over the phone or in person.

#### 8. Use of Information

#### 8.1. Use of personal information



PVFC will use the personal information you have chosen to provide us for the purpose for which you provided it or a related secondary purpose which you would reasonably expect. PVFC will not use it for any other purpose without your consent, unless permitted or required by law.

Generally, we will use your personal information for the following purposes:

Providing the products and/or services you have requested from PVFC for example:

- a) To process sales transactions (whether instore or online).
- b) To deliver the products or services to you.
- c) To register you for a service requested by you, such as members services, our newsletter(s), e-newsletter(s), mail outs or competitions and administering such services.
- d) To manage warranty claims.
- e) To respond to any inquiries, feedback or complaints made by you.
- f) Direct marketing of products and services which we believe may interest you, including product updates and developments, special events or promotions.
- g) Assisting us to improve our products and services and making them more relevant to you.
- h) Assisting us to improve our website(s) or Facebook page.
- i) Processing and assessing membership, employment, or volunteer applications for current and future positions.
- j) Otherwise managing our internal business operations and processes.

#### 8.2. Use of anonymous information

PVFC gathers anonymous information to:

- a) Monitor the use of our website(s)
- b) Help us make improvements to the website(s)
- c) Offer relevant information and services to as many users as possible.

#### 9. Disclosure

There will be occasions here it will be necessary for PVFC to disclose your personal information to third parties.

PVFC may disclose your personal information to:

a) Contractors and third-party service providers on a confidential basis that we use in the ordinary course of our business to assist with the delivery of the product or service. This includes organisations such as marketing agencies, data processing companies, printing and mailing houses, delivery companies, or finance agencies or debt collection agencies.



- b) Other members of PVFC's corporate group for marketing purposes (subject to obtaining your prior consent).
- c) Government authorities or other third parties as required by law.
- d) Any other purpose that you have consented to.

#### 10. Transfer of information outside Australia

PVFC will not disclose your personal information to recipients outside Australia.

Other than as stated above, we do not disclose personal information that you may give us to any organisation or person outside of PVFC unless you have authorised us to do so.

# 11. No sale of personal information

Under no circumstances will PVFC sell or receive payment for licensing or disclosing your personal information.

# 12. Security

The security of your information is important to us. PVFC operates secure data networks that are designed to protect your privacy and security. When we have collected information about you it cannot be seen or modified by anyone else. PVFC has implemented generally acceptable standards of technology and operational security to ensure personal information (in both physical and electronic form) is protected against loss, misuse, interference, and unauthorised access.

Only authorised PVFC personnel and contractors are provided access to personal information and have agreed to ensure the confidentiality of this information. Reasonable steps are taken to destroy or permanently de-identify any personal information that is no longer required.

We review and update our security measures in light of current technologies. You should, however, be aware that the internet is not a secure environment and information sent via the internet (including email) cannot be guaranteed to be totally secure.

# 13. Data quality, access, and correction

#### 13.1. Access

If you are a subscriber to one of our online services or products, you may access your information at any time by accessing your subscriber/account details via the relevant facility on our website(s).

Otherwise, you may at any time, request access to personal information that PVFC holds about you by making a request to our Privacy Officer at the address or email address below.

We will endeavour to process any requests for access to personal information within a reasonable period of time.



Where possible, we will provide you with access to that information either by providing you with copies of the information requested, allowing you to inspect the information requested, or providing you with a summary of the information held. If we need to deny your request for access, we will let you know why and inform you how you may lodge a complaint regarding this decision. Generally, this will only be in cases where providing access would be unlawful or is subject to a potential legal claim or proceeding.

#### Correction

We will try to ensure that all information we collect, use, or disclose about you is accurate, complete, up to date, and relevant to the service being provided.

If you are a subscriber to one of our online services or products, you may change your personal information at any time by accessing your subscriber/account details via the relevant facility on our website(s).

Otherwise, if you discover or suspect that there is an error or information is missing, please forward your request for correction to our Privacy Officer in writing at the address or email address below. Our Privacy Officer will consider your request and as soon as practicable, manage the correction of your personal information and will update you in writing. If your correction request is refused, our Privacy Officer will provide you within a reasonable period of time, the reasons for such refusal and inform you of the complaint process (see below).

#### Complaints about privacy and our complaint handling 14. procedure

If you have any complaints relating to the management of your personal information or if you believe there has been a breach of the APPs by PVFC please forward your complaint in writing to our Privacy Officer at the address or email address below.

Our Privacy Officer will consider the complaint and advise you of their decision in writing within a reasonable time from receipt of the complaint.

If our Privacy Officer decides that there has been a breach of the APPs, she/he will endeavour to ensure that the breach is rectified within thirty days from the date of the decision and will update you in writing. If the breach has not been rectified within thirty days, then our Privacy Officer will inform PVFC's Secretary in order to resolve the matter.

If you are still not satisfied after lodging a complaint with us and have given us reasonable time to respond, then we suggest that you contact the Office of the Australian Information Commissioner by:

- Phone: 1300 363 922 (local call cost, but calls from mobile and pay phones may incur higher charges). If calling from overseas, (including Norfolk Island): +61 2 9284 9749.
- TTY: 1800 620 241 (this number is dedicated to the hearing impaired only, no voice calls).
- Translating and Interpreting Service (TIS): 13 14 50 (If you don't speak English, or English is your second language, and you need assistance and ask for the Office of the Australian Information Commissioner).

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- Post: GPO Box 2999, Canberra ACT 2601.

Fax: +61 2 9284 9666.

Email: enquiries@oaic.gov.au

# 15. Contact Privacy Officer

Please contact our Privacy Officer on the contact details below if you would like to:

- a) Enquire about or request access and/or update your personal information.
- b) Report an alleged breach of your privacy rights or make a complaint.
- c) Talk to our Privacy Officer about our Privacy Policy.

Please email: pascoevalesoccerclub@gmail.com

# 16. Miscellaneous

"Personal Information" has the same meaning as in the Privacy Act.

"Website(s)" refers to all websites which are owned, operated or under the control of PVFC.

PVFC reserves the right to modify or amend this Privacy Policy at any time. The effective date will be displayed at the beginning of the policy. To keep visitors informed, PVFC will notify users of changes to our Privacy Policy by prominently identifying the alteration for a period of not less that two weeks on our website.

# 17. Further information on privacy

For more information about your privacy rights in Australia, visit the Office of the Australian Commissioner's website, <a href="www.oaic.gov.au">www.oaic.gov.au</a>

Pascoe Vale Football Club Privacy Policy