



## PRIVACY POLICY

2014



# CONTENTS



Introduction	5
Terminology & Interpretations	6
Part 1- Collection	7
1. Personal Information	7
2. Sensitive Information	7
3. Providing Information	8
4. Collection from Third Parties	8
Part 2- Data Security	8
5. Storage & Protection	8
Part 3- Use & Disclosure	9
6. TFA Website & Other ATFO Websites	9
7. Direct Marketing	10
8. Other Disclosures	10
Part 4 - Openness, Access & Connection	10
Part 5 - Complaints & Enquiries	11

## IMPORTANT

The following points should be considered at all times:

1. Touch Football Australia is recognised as the national sporting organisation for Touch Football in Australia and all affiliated clubs/associations are insured under the National Insurance Scheme.
2. It is essential that Affiliates comply with all relevant laws, by-laws and regulations. You and your affiliate must take all due and reasonable precautions to prevent or mitigate losses. **Failure to do so may prejudice your rights and entitlements under our insurance policy.** Please do not hesitate to contact Touch Football Australia should any assistance be required.
3. The preparation of this document is in no way a commitment from Touch Football Australia to provide funds or make any other contribution now or in the future.
4. Touch Football Australia policies and procedures are dynamic documents which reflect progress in administrative requirements and industry standards. As such to maintain currency, policy and procedures are periodically reviewed and updated. It is important readers ensure they are reading and using the most up-to-date version. To confirm the current version, please contact Touch Football Australia at [www.touchfootball.com.au](http://www.touchfootball.com.au)
5. Touch Football Australia welcomes suggestions or improvements to our policies and procedures.

### **COPYRIGHT © Touch Football Australia**

All rights reserved. These contents of this manual are copyright. Except as permitted under the Copyright Act, no part may be reproduced by any process, electronic or otherwise, without the specific written permission of Touch Football Australia.

# VERSION CONTROL REGISTER

Material Title: Touch Football Australia Privacy Policy

Material Type: Manual

Material Developed by (Author):

Lauren Atkinson, Affiliation Services Coordinator – Touch Football Australia

Marianne Maguire, General Manager Sport Operations - Touch Football Australia

Workplace for Use: TFA National Office, State Councils and Members (Regions, Affiliates and Individuals).

Version Number	Date	Amendments made (brief notes)	Authorised by
Version 1	June 2014	Version 1 released	Marianne Maguire

## INTRODUCTION

The protection of personal information is important to Touch Football Australia (TFA). TFA is committed to respecting the right to privacy and the protection of personal information.

In its role as the peak body of Touch Football in Australia, TFA has developed this Policy to apply to the different Touch Football organisations across Australia. For the purposes of this Policy, an Australian Touch Football Organisation (ATFO) is defined as:

- TFA
- State Organisation being the governing body of Touch Football in each Australian State and Territory known as NSW Touch Football (NSWTA), Queensland Touch Football (QTF), Touch Football ACT (TFACT), Touch Football Northern Territory (TFNT), Touch Football South Australia (TFSA), Touch Football Tasmania (TFT), Touch Football Victoria (TFV) and Touch Football Western Australia (TFWA); and
- Those associations or organisations registered or affiliated with TFA or a state or territory governing body;

Provided that the entity has not chosen to adopt a separate privacy policy.

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



## TERMINOLOGY AND INTERPRETATIONS

The TFA Privacy Policy uses the following terminology and definitions. Unless the context requires otherwise, the following terms shall have the following meanings, which are taken from and referred to in the TFA Constitution:

**Affiliate** means a local entity that conducts and/or administers Touch Football competitions and which a Member of the Association is as described under **clauses 12 and 15** of the Constitution.

**Community** means the TFA community, regrouping participants and members as defined below.

**Individual Member** means a natural person who is a registered financial member of TFA, New South Wales Touch Football (NSWTA), Queensland Touch Football (QTF) and/ or an affiliate, and includes participants.

**Member** means a member of TFA under **clause 12** of the TFA Constitution.

**Participant** means a person who participates, including but not only as officials, coaches, players or referees, in a Touch Football competition organised, controlled or sanctioned by TFA, an affiliate, NSWTA or QTF.

**State Council** means a body established and recognised by TFA under **clause 11** which may also be for a Territory as stated in “State” interpretation.

**Touch Football** (or Touch) means the sport or game played under the rules determined or adopted from time to time by TFA.

**ATFO** means an Australian Touch Football Organisation

**Personal Information** means information or an opinion about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

**Sensitive Information** means information or an opinion about racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, sexual preferences or practices or criminal record or health information.

**TFA Privacy Officer** means the person appointed by TFA from time to time to deal with complaints and inquiries under this Policy.

**Touch Football Online (or TFO)** means the official online program used by TFA to manage the database, competition management and payment system provided by Fox Sports Pulse (formerly SportingPulse).

## PART 1 - COLLECTION

### 1. Personal Information

Personal information is information or an opinion (including information or an opinion forming part of a database) from which is possible to determine someone's identity.

The information collected by an ATFO 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 the ATFO.

### 2. Sensitive Information

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

- 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, an ATFO may also collect sensitive information such as a person's medical history, nationality, their ethnic background and language(s) spoken or the details of any disabilities.

An ATFO is required by law to obtain consent when collecting sensitive information. An ATFO will assume consent to the collection of all sensitive information that is provided to the ATFO for use in accordance with this Privacy Policy, unless told otherwise.

Information may be collected when you:

- a) Become a member of an ATFO;
- b) Subscribe to any publication of an ATFO, including electronic publications;
- c) Provide details to an ATFO in an application or consent form, survey, feedback form or incident report;
- d) Enter personal information into, or agree to having your personal information entered into, one of an ATFO online system such as the online membership database or another ATFO online system;
- e) Access the TFA website or another ATFO website;
- f) Contact an ATFO via email, telephone or mail or engage with an ATFO via social media;
- g) Participate in any program, activity, competition or event run by an ATFO;

- h) Purchase tickets to a Touch Football-related event from an ATFO or an authorised agent or licensee;
- i) Are elected or appointed to the Board or a committee of an ATFO;
- j) Apply for employment or a volunteer position with an ATFO; or
- k) Where the ATFO is required to do so by law (Insurance, Child Protection, Medical Treatment or other legislation in Australia).

### **3. Providing Information**

Depending on the circumstances, some types of information will be required and others might be optional. If you do not give an ATFO some or all of the information it requests, it may affect the ATFO's ability to communicate with you or provide the requested products or services.

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

### **4. Collection from Third Parties**

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

There will be other occasions when an ATFO collects information from another ATFO or third parties.

Examples of such third parties could include, without limitation, the Australian Institute of Sport (AIS), Australian Sports Commission (ASC), the National Rugby League (NRL), non-affiliated Touch Football organisations, government and law enforcement bodies.

## **PART 2 - DATA SECURITY**

### **5. Storage and Protection**

ATFOs store information in different ways, including in paper and electronic form.

Much of the information collected by ATFOs is added to TFA's Online Member Database which is hosted by a third party data storage provider- Fox Sports Pulse (formerly SportingPulse). When your information is entered into the Online Member Database, it may be combined or linked with other information held about you.

Security of personal information is important to TFA. TFA has taken steps to protect the information held by ATFOs from misuse, loss unauthorised access, modification or disclosure. Some of the security measures include strict confidentiality requirements for employees, volunteers and service providers of ATFOs, security measures for system access, and security measures for the TFA website and other ATFO websites.



## PART 3 - USE & DISCLOSURE

ATFOs, and third parties to whom ATFOs may disclose personal information 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 programs, awards, competitions, activities and other events relating to Touch Football;
- d) Research, develop and market products, services, merchandise and special offers made available by ATFO's and third parties;
- e) Respond to emergency situations involving or requiring medical treatment;
- f) Administer, manage and provide you with access to touchfootball.com.au, the online member database and other IT based applications;
- g) Keep you informed of news and information relating to Touch Football-related events, activities and opportunities via various mediums.

ATFOs may use health information to ensure that programs we operate 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, we may use de-identified health information and other sensitive information to carry out research, to prepare submissions to government, or to plan events and activities.

ATFOs may collect information about race or ethnic origin and use or disclose such information to those third parties identified in the list below (including the National Rugby League and relevant sporting or government bodies) for statistical purposes about the demographics of participants playing Touch Football. You are not required to provide this information (when it is requested) and if you do not do so your membership application will not be affected and, upon being accepted as a member, your membership benefits will be the same as any other member.

ATFOs may disclose your personal information to a range of organisations which include but are not limited to:

- a) Other ATFOs and organisations involved in Touch Football;
- b) the National Rugby League (including for direct marketing purposes);
- c) Companies engaged to carry out functions and activities on an ATFOs behalf, including direct marketing;
- d) Professional advisers, including our accountants, auditors and lawyers;
- e) Insurers; and
- f) Relevant sporting or government bodies such as the Australian Sports Commission, Australian Institute of Sport, various National Sporting bodies, Federal and State Departments of sport amongst others; and
- g) In other circumstances permitted by law.

In some circumstances, personal information may also be disclosed outside of Australia. In such instances, ATFOs 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 suitably similar to the Australian Privacy Principles.

### 6. TFA Website & other ATFO Websites

When users visit the TFA website or other ATFO websites, our systems may record certain information about their use of the site, including the web pages visited and the time and date of their visit. ATFOs use this information to help analyse and improve the performance of the websites.

In addition, the 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. ATFOs will treat this information in the same way as other personal information they collect. You are free to disable cookies on your internet browser to prevent this information being collected; however, you will lose the benefit of the enhanced website experience that the use of cookies may offer.

Websites linked to the ATFO websites are not subject to TFA’s privacy standards, policies or procedures. TFA cannot take any responsibility for the collection, use, disclosure or security of any personal information that you provide to a third party website

## **7. Direct Marketing**

We will assume consent to use non-sensitive personal information to provide better services and for marketing purposes (including disclosure of such information to service providers).

Every person whose data is collected by an ATFO has the option to refuse email, SMS or posted offers by making a request in writing to TFA’s Privacy Officer via the contact details set out, updating the direct marketing settings in your user portal in the Online Member Database, or by making use of the opt-out procedures included in any communications from us (however, information relating to the option to unsubscribe from those communications may be retained).

## **8. Other Disclosures**

In addition, ATFOs 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.

## **PART 4 - OPENNESS, ACCESS & CORRECTION**

ATFOs will take all reasonable steps to ensure that the personal information they collect, use or disclose is accurate, complete and up-to-date. However, each ATFO relies on the accuracy of personal information as provided to it both directly and indirectly.

We encourage all users to regularly review and update their personal information on the Online Member Database via [www.touchfootball.com.au](http://www.touchfootball.com.au).

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.

## PART 5 - COMPLAINTS & ENQUIRIES

All issues, complaints and enquiries in relation to the collection, use, disclosure, quality, security of and access to your personal information may be made to the TFA Privacy Officer at this address:

Privacy Officer  
Touch Football Australia  
P: 02 6212 2800  
E: [TFAprivacyofficer@touchfootball.com.au](mailto:TFAprivacyofficer@touchfootball.com.au)

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 [www.oaic.gov.au](http://www.oaic.gov.au) to lodge a complaint.

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

TFA may amend this Privacy Policy from time to time.

