



# SPORT CLIMBING AUSTRALIA

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### Privacy POLICY

<b>Title:</b>	Privacy Policy
<b>Document Number:</b>	
<b>Last Review Date:</b>	May 2020
<b>Responsible Person:</b>	Sport Climbing Australia (SCA) Board
<b>Authority</b>	This Policy is made under clause 39 of the SCA Constitution. It is binding on all Members of CA and is to be interpreted in accordance with the SCA Constitution.



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The protection of personal information is important to Sport Climbing Australia (**SCA**). SCA is committed to respecting the right to privacy and the protection of personal information.

This document sets out how SCA may collect, hold and use personal information. A person providing personal information to SCA (either directly or through an affiliated organisation), is considered to consent to its use, storage and disclosure in accordance with this Privacy Policy and the *Privacy Act 1988*.

## 1 What personal and sensitive information does SCA collect?

### 1.1 Personal Information

Personal information is information or an opinion (including information or an opinion forming part of a database) whether true or not, and whether recorded in material form or not, about an individual whose identity is reasonably apparent, or can be reasonably ascertained, from the information or opinion.

The information collected by SCA 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's licence number, passport number, insurance details, employment history, qualifications or communication history with SCA.

### 1.2 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, SCA may also collect sensitive information such as a person's medical history, nationality, their ethnic background or disabilities.

SCA 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.



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## 2 How does SCA collect personal and sensitive information?

### 2.1 Collection by SCA

Information may be collected when:

- a person becomes a member of a Sport Climbing club, district or regional association, State or Territory association or other body which is a member of or affiliated with SCA (SCA Affiliate);
- a person subscribes to any publication of SCA or a SCA Affiliate, including electronic publications;
- a person provides details to SCA or a SCA Affiliate in an application, consent form, survey, feedback form or incident report;
- a person enters personal information into, or agrees to having their personal information entered into one of SCA's online systems;
- a person accesses the SCA website or a website of a SCA Affiliate;
- a person contacts SCA via email, telephone, fax or mail or engages with SCA via social media;
- a person participates in any program, activity, competition or event run by SCA or a SCA Affiliate;
- a person purchases tickets to a Sport Climbing or a sporting event from SCA or an authorised agent;
- a person purchases tickets to social event such as an awards night from SCA or an authorised agent;
- a person purchases merchandise, products or services from SCA or an authorised agent or licensee;
- a person is elected or appointed to the Board or a Committee of SCA;
- a person applies for employment or a volunteer position with SCA or a SCA Affiliate;
- or
- where SCA is required to do so by law (for education, child protection, work health and safety laws, charitable collections, medical treatment or other legislation in Australia).

### 2.2 Providing information

Depending on the circumstances, some types of information will be required and others may be optional. If a person does not provide some or all of the information requested, this may adversely affect SCA's ability to communicate with that person or provide them the requested products or services.

If a person does not provide requested information, that person may jeopardise their ability to participate in programs or competitions or apply for employment or volunteer positions



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with SCA or a SCA Affiliate. If it is impracticable for SCA to engage with a person because they are withholding requested information or consent, SCA may elect not to do so.

## **2.3 Collection from third parties**

SCA or a SCA Affiliate may collect personal information regarding a child from the parent or other responsible person associated with that child. In many circumstances, SCA collects information from SCA Affiliates or other third parties.

Examples of such third parties may include, without limitation: the Australian Sports Commission (ASC), Sport Integrity Australia (SIA), the Australian Institute of Sport (AIS), Commonwealth Games Australia (CGA), non-affiliated Sport Climbing organisations or government and law enforcement bodies.

## **2.4 Information storage and protection**

SCA stores information in different ways, including in paper and electronic form.

Much of the information SCA collects from and about our members is added to SCA's membership database which is hosted by a third party data storage provider. When a person's information is entered into SCA's membership database, the information may be combined or linked with other information held about that person. SCA's membership database is shared among SCA, its State and Territory Sport Climbing associations and its members, with each organisation having access to information relevant to its members.

Security of personal information is important to SCA. SCA has taken steps to protect the information held from misuse, loss, unauthorised access, modification or disclosure. Some of the security measures SCA uses includes strict confidentiality requirements of SCA employees, volunteers, SCA Affiliates and service providers as well as security measures for system access and security measures for SCA websites such as firewalls and system encryption.

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



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## 3 How does SCA use and disclose personal and sensitive information?

### 3.1 Use

SCA, and third parties to whom SCA may disclose personal information in accordance with this Privacy Policy, may use a person's personal information to:

- verify their identity;
- complete background checks;
- research, develop, run, administer and market competitions, programs, activities and other events relating to Sport Climbing;
- research, develop and market products, services, merchandise and special offers made available by SCA and third parties;
- respond to emergency situations involving or requiring medical treatment;
- administer, manage and provide that person with access to [www.sportclimbingaustralia.org.au](http://www.sportclimbingaustralia.org.au);
- police or other legal agencies for the purposes of medical treatment amongst others;
- administer and manage SCA membership databases, self service portal and other IT based applications; and
- keep that person informed of news and information relating to various Sport Climbing events, activities and opportunities via various mediums.

SCA may use health information to ensure that programs SCA operates 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, SCA 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.

Notwithstanding anything in this Policy and the Privacy Act SCA is not a provider of a "health service" for the purposes of the Privacy Act.

### 3.2 Disclosure

SCA may disclose a person's personal information to a range of organisations which include, but are not limited to:



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- SCA Affiliates and other organisations involved in Sport Climbing in Australia;
- **Companies SCA engages to carry out functions and activities on SCA's behalf, including direct marketing;**
- SCA professional advisers, including accountants, auditors and lawyers;
- SCA insurers;
- relevant sporting bodies such as International Federation of Sport Climbing (IFSC) , SIA, AIS, CGA, various National Sporting bodies, Federal and State Departments of Sport amongst others; and,

### **3.2.1 in other circumstances, permitted by law.**

In some circumstances, personal information may also be disclosed outside of Australia - for example personal information is disclosed to IFSC which is located in Italy and legally based in Switzerland. In such circumstances, SCA 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.

### **3.3 Direct marketing**

Unless you advise SCA otherwise SCA 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 SCA has the option to refuse e-mail, SMS or posted offers by making a request in writing to SCA via the contact details set out below, or by making use of the opt-out procedures included in any communications from SCA (however, 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 also write to SCA's Privacy Officer via the contact details set out below.

### **3.4 Other disclosures**

In addition, SCA may also disclose personal information:

- with a person's express or implied consent;
- when required or authorised by law;
- to an enforcement body when reasonably necessary; or
- to lessen or prevent a threat to an individual or public health or safety.

### **3.5 SCA websites**

When users visit SCA websites, SCA systems may record certain information about their use of the site, including the web pages visited and the time and date of their visit. SCA uses this information to help analyse and improve the performance of SCA websites.



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In addition SCA may use “cookies” on SCA websites. 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 SCA uses may collect some personal information. SCA will treat this information in the same way as other personal information SCA collects. A user is free to disable cookies on their internet browser to prevent this information being collected; however, users opting to do so will lose the benefit of the enhanced website experience that the use of cookies may offer.

External websites linked to SCA websites are not subject to SCA's privacy standards, policies or procedures. SCA cannot take any responsibility for the collection, use, disclosure or security of any personal information that a person provides to a third-party website.

## **4 Accessing and seeking correction of information held by SCA**

SCA will take all reasonable steps to ensure that the personal information it collects, uses or discloses is accurate, complete and up-to-date. However, SCA relies on the accuracy of personal information as provided to SCA both directly and indirectly.

SCA encourages all users to regularly review and update their personal information. If a user would like to access personal information that SCA hold about them, SCA requires that user to put their request in writing. If SCA does not allow access to any part of the personal information SCA holds about a user, SCA will provide an explanation.

Individuals may also request access to their personal information held by SCA by making a request via the contact details set out below. SCA will respond to any request for access within 7 working days and will refer requests to a person's Sport Climbing organisation to provide the requested information. The Sport Climbing organisation will endeavour to provide the requested information in a timely manner. If the requested information is not received, SCA should be notified. If the personal information SCA holds is found to be inaccurate, incomplete or out-of-date, SCA should be advised immediately so that SCA may arrange for it to be corrected.

## **5 Resolving privacy issues and complaints**

Any issues or complaints in relation to the collection, use, disclosure, quality, security of and access to personal information may be made in writing to SCA at this address:

Sport Climbing Australia  
Privacy Policy  
PO Box 341W  
Ballarat West 3350

In order to maintain the confidentiality of personal information, SCA may ask a person to visit the SCA office and to provide specific identification before access may be granted. If it is not possible for a person to personally visit the SCA office, SCA will arrange to check a person's identification before information is sent.

SCA will endeavour to respond to complaints within 60 working days. If SCA is unable to resolve a complaint within a reasonable timeframe, or if an individual is unhappy with the



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outcome of their complaint, they can contact the Office of Australian Information Commissioner via the enquiries line 1300 363 992 or website <http://www.oaic.gov.au/>.

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

SCA may amend this Privacy Policy from time to time.