



## Privacy Policy

The Swan Districts Football Club (**Swans**) believes privacy is an important right of individuals. Swans takes steps to protect your personal information from misuse and to use your information only in the ways described in this privacy policy and in accordance with the *Privacy Act 1988 (Cth)* (**Privacy Act**).

This privacy policy does not apply to personal information collected, or otherwise obtained, by Swans in relation to current and former employees and which relates directly to the employment relationship that exists, or existed, between Swans and its current and former employees.

Except where otherwise indicated, terms used in this privacy policy have the same meaning as those in the Privacy Act.

### 1. Open and transparent management of personal information

We make our privacy policy available on our website located at [www.swandistrictsfc.com.au](http://www.swandistrictsfc.com.au) and we can also provide a hard copy version upon request. If you would like more information or a hard copy of this privacy policy, please contact us by:

- Phone: (08) 9279 8700
- the online enquiry form on our website.

You should use the details above to contact us if you have a complaint about a breach of the Privacy Act by us. We will respond to your complaint and endeavour to resolve it as soon as possible and, in any event, within 30 days. If you are not satisfied with our response, you can lodge a complaint with the Office of the Australian Information Commissioner: see [www.privacy.gov.au/complaints](http://www.privacy.gov.au/complaints)

### 2. Anonymity and pseudonymity

In most circumstances, it is impractical for people to communicate with Swans anonymously as we need to identify you to assist you effectively. However, in circumstances where it is lawful and practicable to do so, Swans will provide you with the option of not identifying yourself, or using a pseudonym, when entering into communications with us.

### 3. Collection of solicited personal information

Swans only collects personal information where reasonably necessary for our functions or activities as a not-for-profit sports association, and to provide people involved in the club, or who otherwise interact with Swans, with a high level of service. Swans collects personal information only by lawful and fair means.



It may be necessary in some circumstances for Swans to collect sensitive information about you. 'Sensitive information' includes information about your race, gender, disability, criminal history or other personal characteristic. We will only collect and use sensitive information with your prior and informed consent. Swans will permanently delete, destroy or de-identify any sensitive information once no longer required. This privacy policy applies to personal information held by Swans, including personal information collected in connection with the club's purpose, vision and functions, whether collected:

- via our website located at [www.swandistrictsfc.com.au](http://www.swandistrictsfc.com.au)
- by telephone;
- in person;
- by documents posted to us;
- by documents handed to or collected by us;
- via Facebook, Twitter or other social media; or
- some other means.

We may store your personal information in hard copy, in electronic form, on encrypted electronic devices or on secure computer databases. We will only collect personal information about you from a third party if it would be unreasonable or impracticable not to collect the information directly from you. In these circumstances, Swans may collect personal information about you from third parties, such as:

- professional, amateur or junior football clubs of which you are a member; and
- The Western Australian Football Commission.

The types of personal information we might collect includes, but is not limited to:

- your name;
- your date of birth;
- your residential, postal and email addresses;
- your home and mobile telephone numbers;
- your occupation; and
- your sporting interests.

### **Cookies**

We utilise "cookies" which enable us to monitor traffic patterns and to serve you more efficiently if you revisit our website. A cookie does not identify you personally, but it does identify your computer. You can set your browser to notify you when you receive a cookie and this will provide you with an opportunity to either accept or reject it in each instance. If you reject a cookie, some of the parts or features of the website may not function properly.

We also use cookies to collect website statistics (which includes pages accessed and search terms used) but this information is not identifiable (i.e. we cannot tell who you are).



## 4. Use or disclosure of personal information

Personal information collected by Swans is used for the primary purpose of providing services to people connected with the club or whom otherwise interact with Swans in connection with the objects in our Constitution.

Where personal information is collected as part of a promotion, competition or fundraising activity, it is used primarily to administer those activities.

We will not use your personal information for a secondary purpose (other than direct marketing) unless you consent to the use or disclosure, or you would reasonably expect us to use it for a secondary purpose which is related to the primary purpose. In these circumstances, Swans may disclose your personal information to entities and persons such as:

- our agents, such as those involved in our promotions, competitions and fundraising activities; and
- our contracted service providers.

## 5. Direct marketing

Unless you request otherwise, we may also use your personal information for marketing purposes to send you news, information about our activities and general promotional material which we believe may be useful or of interest to you.

If you do not want us to use your personal information in this manner, please contact us and we will give effect to your request as soon as possible and, in any event, within 7 days.

## 6. Cross-border disclosure of personal information

Swans does not send personal information overseas.

## 7. Adoption, use or disclosure of government related identifiers

We do not collect, adopt, use or disclose Government identity numbers, such as tax-file numbers.

## 8. Quality of personal information

We keep your personal information as accurate, complete and up to date as possible. We try to ensure this data is of high quality, but this relies on the accuracy and frequency of data provided by you.

You can assist us by notifying us if your circumstances change, such as if your name or address changes.



## 9. Security of personal information

We take reasonable steps to protect your data from misuse, interference and loss, and from unauthorised access, modification or disclosure.

Swans also takes reasonable steps to destroy or permanently delete or de-identify personal information which is no longer needed for the purposes described in this privacy policy.

## 10. Access to personal information

You have the right of access to personal information which Swans stores about you. If you are of the belief that Swans holds personal information relating to you and you wish to obtain access to this information, please contact us on the details provided above in "Section 1 - Open and transparent management of personal information".

If such a request is made, we will review our records to determine what personal information relating to you we hold and endeavour to respond to your request within a reasonable period after the request is made, but in any event, within 30 days. We endeavour to ensure the person who is seeking access is indeed the person the information is about, and in this regard, we may request that identification is provided before the personal information is released.

Once we have notified you of the nature of the personal information relating to you which we hold, we will give you access to your personal information in the manner requested by you, if it is reasonable and practicable to do so.

Swans does not levy a charge in respect of the making of a request for access to personal information held by us. However, Swans may charge you for the reasonable costs incurred by it in providing you with access to the personal information held by us.

We may not provide access to some of the personal information which we hold in the following circumstances where Swans considers that:

- (a) providing access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety; or
- (b) giving access would have an unreasonable impact on the privacy of other individuals; or
- (c) the request for access is frivolous or vexatious; or
- (d) the information relates to existing or anticipated legal proceedings between Swans and you, and the information would not be accessible by the process of discovery in those proceedings; or
- (e) giving access would be unlawful; or
- (f) denying of access is required or authorised by or under an Australian law or a court/tribunal order; or



(g) we suspect that unlawful activity or misconduct of a serious nature that relates to our functions has been, is being or may be engaged in, and giving access would be likely to prejudice the taking of appropriate action in relation to the matter; or

(h) giving access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or

(i) giving access would reveal evaluative information generated within Swans in connection with a commercially sensitive decision-making process.

If we refuse to give you access to your personal information for any of the reasons above, we will give you a written notice that sets out our reasons for the refusal and the mechanisms available to complain about our refusal.

## 11. Correction of personal information

If we hold personal information about you and we are satisfied that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading, or you request that we correct the information, we will take reasonable steps to rectify the situation. We will correct your personal information upon request free of charge. If we refuse to correct your personal information, we will give you a written notice setting out our reasons for refusal and the mechanisms available to complain about the refusal.

## 12. Related Documents

Nil

## 13. Revision History

| Version No. | Date Approval | Approval Body |
|-------------|---------------|---------------|
| 1           | 30.11.23      | Board         |