

Last Reviewed	June 2023
Next Review	January 2024
Responsible Officer	Governance & Projects Specialist
Applicable Legislation	Privacy Act 1988 (Cth)
Relevant Policies	
Related Procedures	Information Security Manual

WAFC CORE VALUES

Our People | Our Relationships | Being our very best | Leading our Industry

PURPOSE

The Western Australian Football Commission Inc. (**WAFC**) believes privacy is an important right of individuals. The WAFC 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**) and the Australian Privacy Principles contained within.

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

OPEN AND TRANSPARENT MANAGEMENT OF PERSONAL INFORMATION

We make our privacy policy available on our website located at <http://www.wafootball.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) 9381 5599;
- Post: PO Box 275, SUBIACO WA 6904; or
- the online contact form on our website.

You should use the details above to contact us if you have a complaint about a breach of the Australian Privacy Principles or the Privacy Act by us. We will respond to your complaint and endeavor 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 <http://www.privacy.gov.au/complaints>.

ANONYMITY AND PSEUDONYMITY

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

COLLECTION OF PERSONAL INFORMATION

The WAFC 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 football in Western Australia or who otherwise interact with the WAFC with a high level of service. The WAFC collects personal information only by lawful and fair means.

The WAFC will not intentionally collect sensitive information about you. However, there may be certain circumstances where we inadvertently collect sensitive information in the course of our ordinary functions or activities. These circumstances may include where you provide images or other information that includes sensitive information about you. We can only collect sensitive information with your consent. To the extent you inadvertently provide us with any sensitive information, we will assume that you have consented to the collection of that information in accordance with this privacy policy. You may withdraw such consent at any time by contacting us.

This privacy policy applies to personal information held by the WAFC, including personal information collected in connection with the WAFC's functions as caretaker of football throughout Western Australia, whether collected:

- via our website located at <http://www.wafootball.com.au/>;
- by telephone;
- in person;
- by documents posted to us or handed to or collected by us;
- via Facebook, Twitter or other social media;
- from third parties; or
- some other means.

We may store your personal information in hard copy, in electronic form, on electronic devices or on computer databases.

We will only collect personal information about you from a third party if it would be unreasonable or impracticable to collect the information directly from you. In these circumstances, the WAFC may collect personal information about you from third parties, such as:

- the AFL, which manages player registrations and makes this information available to WAFC in connection with data sharing agreements in place between the organisations;
- professional, amateur (senior) or junior football clubs, including WAFL and WAFLW clubs, of which you are a member;
- Ticketmaster, and other ticketing service providers, which provide ticketing services to WAFC coordinated events; and

- third party service providers, such as Play HQ and Officials HQ, which provides the operating system upon which Western Australian community football runs.

Where we collect information about you from a third party, we will take reasonable steps to ensure that you are made aware of the facts and circumstances of that collection, including by setting out the details of such collection within this privacy policy.

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

- Registration Information:** When you register, either directly with WAFC or through a third party with which we have a registration sharing relationship, such as the AFL, you provide information including your full name, email address, postal address, telephone number, date of birth, occupation, location and such other registration information as may be requested by us or our partners from time to time;
- Sporting Information:** When you participate in community football events and organisations, personal information about your performance or participation in such events may be collected by us or our partners including any other ticketing agency we may use;
- Ticketing Information:** When you purchase tickets through Ticketmaster to an event organised by WAFC, we collect certain limited information from Ticketmaster relating to your attendance at our event;
- Financial Information:** In order to facilitate payments or other financial transactions with us, you may provide us with financial information relating to you or another person, which may include bank account details, credit, debit or bank card details or other billing information;
- Communication Information:** When you communicate with us via telephone, email, SMS or online, we may collect information relating to you and any other personal information you choose to provide to us while communicating with us;
- Cookie Information:** We use cookies and similar tracking technologies on our website or app in order to track the use of our services and our website or app, and to maintain and improve our services to you. Further information regarding our use of 'Cookies' is set out below;
- Other Information:** You may provide us information through your participation in product engagement, social media platforms, streaming platforms, customer surveys or other sources that are implemented, published or adopted by us, participation and response in all such matters are strictly at your discretion;
- Health Information:** in the course of providing our services you may be required to provide us with information about your health, including past or present injuries and other medical information. Health information is considered 'sensitive information' and we only collect your health information with your consent and as reasonably necessary to carry out our services, which may include insurance reasons or tailoring our services to you;
- Mobile Data Information:** You may access or use our services via a mobile device or application. We may collect information about you and your device, such as your IP address, location or device information, and any other information provided by your mobile device. If you do not want us to collect your location information you can disable the GPS or location-tracking function on your device;
- Third-party plugin Information:** In some cases, we may have integrated a third-party plugin into our website. The use of such third-party plugins may result in data collection by both us and the relevant third party. We do not control the information you share with third parties

via these plugins. You should refer to the third party's privacy policy to understand their data handling practices.

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).

USE OR DISCLOSURE OF PERSONAL INFORMATION

Personal information collected by the WAFC is used for the primary purpose of providing services to people involved in football in Western Australia or whom otherwise interact with the WAFC in connection with the objects in our Constitution, some examples of why we collect your personal information include:

- to administer and manage Western Australian football participation
- to co-ordinate or confirm membership details of WAFL & AFL clubs
- to otherwise provide services to people involved in football in Western Australia
- to set-up and update your registration details with us
- to collect fees and payments owing to us
- to provide member and participant support
- to comply with legal obligations
- to resolve disputes
- for insurance purposes
- to contact you regarding our services
- to respond to your enquiries and concerns
- to advertise our services to the products and services of third parties
- to deliver targeted marketing materials to you regarding Western Australian football and offers we believe may be of interest to you

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*, covered in further detail below) unless you consent to the use or disclosure or such use would otherwise be permitted in accordance with the Privacy Act, which includes where you would reasonably expect us to use your personal information for a secondary purpose which is related to the primary purpose for which that information was collected.

We will only disclose your information to the extent required to provide our services to you, including for the purposes set out above, or as otherwise requested or authorised. Common third parties to which the WAFC may disclose your personal information include entities and persons such as:

- professional, amateur or junior football clubs of which you are a member;
- our agents, such as those involved in our promotions, competitions and fundraising activities; and
- our contracted service providers.

DIRECT MARKETING

Where permitted to in accordance with the Privacy Act and 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 use the 'Unsubscribe' function included within any direct marketing provided to you or alternatively contact us and we will give effect to your request as soon as possible and, in any event, within 7 days.

CROSS-BORDER DISCLOSURE OF PERSONAL INFORMATION

The WAFC does not send personal information overseas. In the event any circumstance were to arise where cross-border disclosure may be required, the WAFC will ensure that it does not send your personal information to recipients outside of Australia without first obtaining your consent or otherwise complying with the Privacy Act.

ADOPTION, USE OR DISCLOSURE OF GOVERNMENT RELATED IDENTIFIERS

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

QUALITY OF PERSONAL INFORMATION

We keep your personal information as accurate, complete and up to date as possible. We make an effort 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.

SECURITY OF PERSONAL INFORMATION

We take reasonable steps to protect your data from misuse, interference and loss, and from unauthorised access, modification or disclosure. All personal information collected and held by WAFC is subject to WAFC's Information Security Policy. In accordance with this policy, your personal information is stored on secure servers and is only accessible by those persons who need access to the information or in order to carry out our services. We also maintain physical security measures to protect the use and storage of physical records containing your personal information.

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

ACCESS TO PERSONAL INFORMATION

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

In the event that such a request is made, we will review our records to determine what personal information relating to you we hold and endeavor to respond to your request within a reasonable period after the request is made, but in any event, within 30 days. We endeavor 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.

The WAFC does not levy a charge in respect of the making of a request for access to personal information held by us. However, the WAFC 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 the WAFC 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 the WAFC 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 the WAFC 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.

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.

CHANGES TO THIS PRIVACY POLICY

We may update this Privacy Policy from time to time. If we change this Privacy Policy in any material way, we will post a notice on our website prior to the change becoming effective for a period of 30 days. We encourage you to periodically review this page for the latest information on our privacy practices.

The effective date of this Privacy Policy is **26 June 2023**.