

# **ANA Rowing Club Inc. Privacy Policy**

March 2020

# Introduction

ANA Rowing Club Inc. is committed to protecting the privacy of membership data and to processing personal information in accordance with the spirit embodied in the Australian Privacy Principles (APPs). The club wishes to provide assurance to members that personal information will be held and managed responsibly.

Personal information includes a person's name, address, contact details (such as telephone number or email), date of birth and gender.

This Privacy Policy explains how any information the club collects about you is used and kept securely. It sets out how, why and for how long the club uses your personal information, together with who it is shared with.

ANA Rowing Club Inc. upholds the following data protection principles:

- 1. Obtain and process information fairly.
- 2. Keep it only for one or more specified, explicit and lawful purposes.
- 3. Use and disclose it only in ways compatible with these purposes.
- 4. Keep it safe and secure.
- 5. Keep it accurate, complete and up-to-date.
- 6. Ensure that it is adequate, relevant and not excessive.
- 7. Give a copy of his/her personal data to a member on request.

#### The information we collect about you

When you become a member of ANA Rowing Club Inc. (including if you are registering or renewing on behalf of a junior) or subscribe to a periodic enrolment including a junior's program or Learn to Row course, the club may collect the following information about you:

- Contact details (e.g. your name, email address, postal address, phone number, school or organisation name)
- Registration information voluntarily provided to the club via online and hardcopy forms. This may include
  personal, medical, safety and emergency details such as date of birth, relevant medical conditions, and
  emergency contacts.
- Data that may be required to register you for events or competitions that you have chosen to participate in or volunteer for.
- Information required for state, national and international competitions.

If you do not provide the club with all of the personal information that it needs this may affect the club's ability to effectively operate the club and provide benefits of membership.

During the course of your membership the club may collect other information about you such as attendance records, training and performance data, race entry information and other data associated with participation in club activities.

Events may be photographed, televised or otherwise recorded, all of which may capture your participation at an event, an award presentation or a commemorative photograph.

Closed Circuit Television (CCTV) is a security initiative to be implemented and operated by the City of Bayswater around the club's premises for the purpose of maintaining the safety and security of the club premises and of club members and visitors.

### Why the club needs to collect your personal information

The club needs to collect your personal information so that it can manage your membership and operate the club including:

- Maintaining a register of members as required by the Associations Incorporations Act and under the club's constitution.
- Provide communications on operations such as general meetings, club and rowing events, and general club related information.
- Management of membership fees, renewals, other fees including seat fees for competitions.
- Managing and operating club programs.
- Managing membership obligations of Rowing WA.
- Completing entries to competitions and regattas.
- Maintaining appropriate medical, contact information and other information to allow the club to act responsibly in the best interest of members and the participants in club programs.

#### How we use your information

The club may use your personal information for a number of purposes, including:

- To process and manage your membership or fulfil your voluntary role with ANA Rowing Club Inc.
- To process and manage requests and participation in club programs.
- To process and manage your registration with Rowing WA.
- To manage your membership including participation in club and rowing activities.
- To deal with your requests and enquiries.
- To communicate with you and notify you about club activities, requests for volunteers, registrations, rowing competitions and events.
- To organise club activities and manage risk and safety.
- To display photographs on club affiliated websites, in the clubhouse or otherwise in public media.

ANA Rowing Club Inc. will not intentionally share your personal information with any third parties for marketing purposes. As part of our affiliation to Rowing WA and Rowing Australia the club is required to provide personal information (names, addresses and contact details) concerning members and rowing participants which is then understood to be used for sport participation management including insurance.

ANA Rowing Club Inc. uses third party suppliers to provide services including Information Technology (IT) related services for managing, storing and processing data. Such suppliers may include 'IT cloud providers' including 'Google' and 'Dropbox'. The club does not envisage that personal information transmitted using these services as "data processors" will inadvertently result in the sharing of personal information with external third parties.

It is intended such personal information is restricted to those specific purposes contemplated by the club for the benefit of members.

The club may be required to share personal information with statutory or regulatory organisations to comply with statutory obligations. This would be done in accordance with both legal requirements and applicable data protection legislation. The club reserves the right to share personal information with its professional and legal advisors for the purposes of taking advice.

# **Protecting your information**

Keeping your personal information secure is a priority ANA Rowing Club Inc., whether that data is in physical (paper) or electronic form. Personal data is kept secure and is only made available to club officers, coaches and officials on a 'need to know' basis.

Paper based information and membership application forms are maintained securely on the club's premises or with the club President, Captain, Secretary, Treasurer or Assistant Treasurer - Secretary.

Reasonable efforts are made to ensure electronic based information is maintained securely including using reputable third party suppliers, such as Google or Dropbox, adopting responsible security protection measures proportionate to the sensitivity of information held.

### **Data Management**

It is the policy of the club to hold information on the following basis:

- Individual's name held indefinitely as a record of membership of the club.
- Data on any injuries or medical conditions as provided by you to ANA Rowing Club Inc. It may be maintained for up to 7 years if required for insurance purposes.
- Attendance records, training records and assessments. The club may hold this data while membership exists. It may be maintained for a longer period if required for insurance or legal purposes. A record of attendance at meetings may be held indefinitely as part of the records of the club.
- Competition entries and results (names and events) the club may hold indefinitely as a record of club sporting events.
- Club operated programs the club may hold indefinitely as a record of club activity.

#### Consent

By submitting your personal data to ANA Rowing Club Inc. either by the process of applying for, becoming or renewing membership or by other involvement including participation in programs offered by the club, you agree to the processing, storing and transfer of personal data.

# Finding out what information the club holds

If a person requests access to their own personal information held by the club it will generally be disclosed. The Associations Incorporations Act (2015) includes provisions to allow members access to the register of members so long as the purpose is connected to the affairs of the club. The club may refuse a request for access in limited circumstances (for example where providing access would result in a serious threat to the safety of an individual or where the access would be unlawful). In the event the club refuses to provide access, the club will provide you with a written notice setting out the reasons for the refusal and the mechanisms for making a complaint about it.

If a person can show that personal information about him or her held by the club is inaccurate, incomplete, irrelevant or out-of-date, the club will take reasonable steps to correct the information and notify third parties to which it has provided the information, or if there is disagreement about the accuracy, provide the person with written reasons for its refusal to correct the information and information about how to make a complaint and attach to the information a statement noting that the individual claims the information is inaccurate, incomplete, irrelevant or out-of-date.

The relevant club contact is the Secretary in seeking to resolve matters referred to in the above paragraph. Please contact ANA Rowing Club Inc. by email: <a href="mailto:secretary.ana@gmail.com">secretary.ana@gmail.com</a>

ANA Rowing Club Inc. will endeavour to respond to your request within 30 days.

#### Making a complaint

A complaint about the club's handling of personal information may be made by email to: secretary.ana@gmail.com

#### Changes to the Privacy Policy

The club intends to regularly review this Privacy Policy and updates will be notified on the club website as they occur. This Privacy Policy was last updated in January 2020.