



ACT RUGBY UNION

PRIVACY POLICY

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In the course of carrying out its functions, the ACT Rugby Union (**ACTRU, we, us, our**) may from time to time collect the personal information of those with whom we deal. The privacy of your personal information is important to us. We are committed to ensuring that information we hold about you is held securely and that your confidentiality is protected.

The ACTRU is bound by the National Privacy Principles under the Privacy Act. We are committed to ensuring that all our business dealings comply with the National Privacy Principles and acknowledge the importance of keeping personal details confidential and secure.

The personal information of players, officials, administrators, coaches, managers, selectors, referees and touch judges (**Participants**) is handled in accordance with the privacy policy of the Australian Rugby Union (ARU). If for any reason, the ARU Policy does not apply, then this Policy does.

This Privacy Policy, has been prepared in relation to the privacy entitlements of ACTRU members and others with whom we deal (eg: contractors, volunteers and others whose personal information we collect) and aims to explain the application of the National Privacy Principles to the ACTRU's business. Consequently this Policy should be read in conjunction with the National Privacy Principles.

To the extent that there is any direct inconsistency between this Policy and the National Privacy Principles, the Principles prevail. The National Privacy Principles may be viewed at the Privacy Commissioner's web site. The Privacy Commissioner's contact details may also be found at the web site.

We support:

- fair and open collection practices;
- processes that ensure information is accurate, complete and current;
- individuals' rights to see and where necessary correct information about themselves; and
- limiting the use of information.

This policy explains how we treat information that we hold about you. It details the type of information we collect, how we may use that information, to whom we allow access and how we protect it. The ACTRU reserves the right to change the terms of this Policy.

If you have any questions relating to this Privacy Policy, or you would like the current version (in the event that since the issue of this version, the Policy has been changed), please contact the ACTRU's Privacy Officer whose details are located on the last page of this document.

Collection

The types of information we collect, from whom we collect it, how we use it and to whom we disclose it will depend on the product or service we provide to you.

The information we collect may include your contact details and your financial details together with transaction information relating to your membership and any product or service we provide to you. This information may include details of payments, credit card details, cheque account details, changes to your membership, history of participation, complaints about you and complaints that you may have against the ACTRU or any other union or club.

If necessary we may collect your health and other sensitive information, but we will obtain your consent before doing so.

We will endeavour to collect most of this information directly from you but we may also collect some of it from:

- our ticketing contractor(s);
- our contracted information processing centre(s);
- another union, including the ARU;
- our volunteer workers and contractors with whom you discuss your membership; and
- participants and members;
- any other ACTRU contractor or service provider to whom you provide your personal information.

There may be other persons and entities from whom, from time to time, we may collect your personal information.

No matter from whom we collect your personal information, we will be fair and open and we will not make any unreasonably intrusive enquiries.

Where we collect information about you from someone else we will, wherever possible, make sure you know the information listed below unless telling you of these matters would pose a serious threat to the life or health of any individual.

When collecting personal information we will take reasonable steps to let you know:

- our identity and how to contact us;
- the fact that you can gain access to your information;
- the purpose for which the information is being collected;
- to whom we disclose this information;
- any law that requires information to be collected; and
- the main consequences (if any) for you if information is not provided.

Where practicable we will provide you with this information before or as soon as possible after we receive your personal information. We will generally do this by issuing you with a privacy statement

when we first collect your personal information. The privacy statement relates not only to the information we collect on that occasion (ie. on and after 21 December 2001) but also to any information we subsequently collect.

Of course, you can elect not to provide us with your personal information but this may affect our ability to provide you with and administer our products and services.

ACTRU collects your personal information for a number of purposes (primary purposes). These include:

- processing your application for membership or participation;
- responding to your queries and issuing you a membership card;
- administering and managing the products and services we provide to you or that you provide to us including your seat allocation, and jacket (where applicable);
- if you are a member of the ACTRU, sending you our newsletters (unless you tell us that you don't want them);
- providing you with information, including by way of direct marketing, about other products or services that we may make available to you from time to time;
- contacting you about renewal of your membership; and
- facilitating our internal business operations, including updating internal databases, conducting consumer satisfaction surveys, fulfilling regulatory and legal requirements and system testing.

Use and Disclosure

We will not use or disclose personal information for a secondary purpose (a purpose other than a primary purpose), unless:

- it is related to the primary purpose and where you would expect us to so use or disclose it;
- you have consented for us to use or disclose the information;
- we suspect unlawful activity and we use or disclose the personal information as a necessary part of our investigation or in reporting our concerns to the relevant persons or authorities;
- we reasonably believe the use or disclosure is necessary to reduce or prevent a serious and imminent threat to an individual's life, health or safety or a serious threat to the public;
- we reasonably believe the use or disclosure is reasonably necessary for an enforcement body to prevent, investigate or prosecute certain breaches of the law, the protection of the public revenue, seriously improper conduct or prescribed behaviour; or
- where we are required or authorised by law.

We may disclose your information to:

- our agents, contractors and third party service providers that provide financial, administrative or other services in connection with the operation of our business, such as our ticketing contractor(s), information processing contractor(s), printers, document archivists, auditors, accountants and lawyers;
- another union or club or related body, including the ARU;
- a stadium or other venue for the purposes of seat allocation;
- direct marketing companies, including companies with which we agree may direct market to our members and participants;
- our related entities;
- where the law requires or permits us to do so;
- where we collect your information from someone else (for example the person who paid or arranged for your membership), then we may disclose any of your personal information to that person or entity;
- your agent; and
- with your consent.

If we think that other products or services may be of benefit to you, we will use your contact details to market that product or service to you. In some cases this may be outsourced to a direct marketing company. We may also agree with other companies, that they may direct market their products to you. Those companies will only be made aware of your contact details to complete that particular marketing promotion.

If at any time you do not wish your details to be used for direct marketing purposes, please contact our Privacy Officer at the address detailed at the end of this document. You will not be charged for exercising your right to opt out of our direct marketing programs.

Data Quality

We will take all reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and current. If you are aware of any error or inaccuracy in the personal information about you that we hold or use, please contact the Privacy Officer.

Data Security

We will take all reasonable steps to protect your information from misuse, loss, unauthorised access, modification or disclosure.

Your information is stored only in secured premises and electronic databases. The data bases are password and access-level protected. Only staff and our contractors (and their staff) who need access to members' personal information for one of ACTRU's functions or activities are allowed access.

Some information may be kept by ACTRU for a number of years to comply with legal requirements. Any personal information that is no longer needed is disposed of in a secure manner or is de-identified.

Openness

We will maintain clearly expressed policies on our management of personal information and make them readily available. We will make our privacy statement and this Privacy Policy available to any member whose personal information we hold.

On request, we will let you know generally the sort of personal information we hold, for what purposes, and how we collect, hold, use and disclose that information. If the privacy statement and Privacy Policy do not satisfy your request, we will consider your written representations and if reasonable we will endeavour to take reasonable steps to provide you with further information.

Access and Correction

In addition if you request us, we will provide you with access to your personal information except where it:

- poses a serious and imminent threat to the life or health of any individual;
- would have an unreasonable impact upon the privacy of others;
- is frivolous or vexatious;
- relates to existing or anticipated legal proceedings with you and would not be accessible through discovery;
- may reveal our intentions and prejudice negotiations with you;
- may prejudice investigation, prosecution or other action in respect of any possible unlawful activity;
- would be unlawful or denial of access is allowed by law; or
- may damage national security.

If we deny access to you, we will provide our reasons.

A fee will not be charged for an access request but you may be charged the reasonable expenses we incur (such as search and photocopying costs).

We will correct personal information held if we discover, or you are able to show us, that it is incorrect. If you ask us to correct your personal information and we do not agree that it is wrong, we may refuse to change it but we will explain our reasons. In these circumstances, if you ask we will keep a statement with the information that shows our disagreement and the fact that you regard it as inaccurate or out of date.

Identifiers

We will use our own identifiers and not those assigned by the government unless we are required to do so, or the law or National Privacy Principles permit us to.

Anonymity

If we can (and if you want us to) we will deal with you anonymously.

Where it is lawful and practicable, we will allow you to enter into transactions with us on an anonymous basis.

Transborder Data Flow

We will not transfer personal information to someone in a foreign country, unless one of the following circumstances apply:

- you have consented to the transfer;
- the transfer is necessary to perform the contract between you and the ACTRU or you and a third party;
- the transfer is for your benefit;
- it is impractical to get your consent and it is likely that consent would be given; or
- we have taken reasonable steps to ensure those to whom we transfer the personal information, protect it and your privacy to the same standard as we do.

Further Information

If you have any further questions about this Privacy Policy please contact our Privacy Officer:

The Privacy Officer
ACT Rugby Union
LPO Box 5039, University of Canberra
Bruce, ACT, 2617
Phone (02) 6260 8588
Fax (02) 6260 8591