



PRIVACY POLICY

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This Position Statement replaces any and all previous versions of GA's Privacy Policy (which was most recently approved by the GA Board on 6 April 2014).

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APPLICABILITY

Gymnastics Australia's Privacy Policy applies to all "Australian Gymnastics Entities" as defined below but applies only to personal information that is collected by Gymnastics Australia.

Association Members and Club Members are included in the policy due to their contribution to and access to personal information when using systems managed by Gymnastics Australia such as the Staff Site, Club Administration Portal (within the national database) and Online Competition Registration System.

Association Members and Club Members should develop their own Privacy Policies in relation to data that they collect within their businesses or should consider the adoption of the proposed GA Policy modified for their own circumstances.

This Policy does not attempt to place any restrictions on any other Australian Gymnastics Entities in terms of how they collect, protect, utilise and/or share any personal information that they collect themselves.

INTRODUCTION

Privacy is important to Gymnastics Australia and each of the Australian Gymnastics Entities listed below. Gymnastics Australia and Australian Gymnastics Entities are committed to respecting the right to privacy and the protection of personal information in accordance with the Privacy Act 1988 (Cth).

Gymnastics Australia may disclose your personal information to the Australian Gymnastics Entities and Australian Gymnastics Entities may disclose your personal information to Gymnastics Australia. Each organisation will collect, hold and use your personal information in accordance with this Privacy Policy.

In this Privacy Policy:

- a reference to "Australian Gymnastics" means a reference to Gymnastics Australia and the Australian Gymnastics Entities collectively; and
- depending on the context, "we", "our" and "us" refer to Gymnastics Australia and/or the Australian Gymnastics Entities.

If you do not provide us with the information that we request, then we may not be able to provide you with our products and services.

This document sets out how we may collect, hold and use personal information. By providing your personal information to us, you consent to its use, storage and disclosure in accordance with this Privacy Policy.

If anything in this Policy is inconsistent with any Federal, State or Territory law, the relevant Federal, State or Territory law prevails to the extent of the inconsistency.

AUSTRALIAN GYMNASTICS ENTITIES DEFINITION

For the purpose of this policy, each of the following is an Australian Gymnastics Entity (AGE):

1. Gymnastics Australia.
2. Affiliated State Gymnastics Association Members, being the governing body of Gymnastics in each Australian State and Territory known as Gymnastics ACT, Gymnastics Victoria, Gymnastics New South Wales, Gymnastics Queensland, Gymnastics NT, Gymnastics WA, Gymnastics SA and Gymnastics Tasmania;
3. Affiliated Club Members, being those Gymnastics Clubs that are currently affiliated to a State Gymnastics Association; and
4. Affiliated Gymnastics Australia Technical Members, being those coaches and judges holding a current Technical Membership with Gymnastics Australia.

It is important to note that only Gymnastics organisations that are affiliated with Gymnastics Australia can be an Australian Gymnastics Entity. This Policy will not apply if you choose to deal with a non-affiliated Gymnastics organisation.

Please refer to clause 5.13 of the Gymnastics Australia Constitution for more information.

PERSONAL INFORMATION

"Personal information" is information or an opinion (including information 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.

We use personal information only for the purposes for which it was provided and for directly related purposes (unless otherwise required by or authorised under law). We may state a more specific purpose at the point we collect your information.

COLLECTION OF PERSONAL INFORMATION

We collect personal information to properly and efficiently carry out our respective functions, including to provide you with your requested products and services, and to facilitate the provision of marketing and promotion services/materials that may be of interest to you.

If it is unreasonable or impracticable for us to deal with you in circumstances where you have not provided the information or consents that we have requested, we may have no realistic option but to decline to do so.

The personal information collected and held about you by the AGEs will vary depending on the circumstances of collection and may include, but is not limited to, the following:

- contact information, such as your name, phone numbers, address details, email address and social media details (Facebook name, or Instagram handle, for example);
- your date of birth, age, gender;
- events entries and results;
- details of gymnastics programs that you have participated in and the organisations that you have participated with;

- details of a disability or an incapacity that you may suffer, if you elect to provide that information to allow us to provide you with relevant services, information and assistance;
- details of your cultural background, nationality, and language(s) spoken, if you elect to provide that information to allow us to provide you with culturally sensitive information, services and assistance;
- copies of communications between us and you;
- information regarding any outstanding payments owed by you to us;
- information regarding disciplinary or child safety concerns raised with or reported to us;
- other personal information provided voluntarily by you (for example, this could be information provided voluntarily by you in response to surveys or competitions);
- your payment details, if you apply for membership, purchase goods or services from, or make other payments to, an AGE or their agents, licensees or contactors;
- details of your academic qualifications, results, professional interests, reference checks, car registration and drivers licence details (if applicable), if you apply for employment or volunteer positions with us or where otherwise in connection with an investigation conducted by us;
- background checks, including reference checks, police checks, working with children checks and completed member protection declarations and related documents such as Drivers Licence and Passports. This personal information may be obtained and retained by us as necessary if:
 - you apply for, and/or obtain employment or a volunteer position;
 - you apply for and/or obtain Gymnastics Australia Technical Membership;
 - you are proposing to, or provide certain services to us;
 - you apply for and/or obtain accreditation at a gymnastics event;
 - you are a gymnastics participant participating in one of our programs or a gymnastics competition or event;
 - you are involved in a matter or investigation conducted by us; or
 - appropriate in the circumstances to obtain background checks in relation to you before entering into contracts, arrangements or understandings with you, or entities related to you;
- medical information and emergency contact details; and
- non-personally identifiable information, such as your IP address, browser type, web pages visited (that may, if combined with other information, be personal information).

Some of the personal information that you provide to us may be required in order to allow us to provide requested products or services to you. Other information may be provided at your discretion. Whilst you have control in the personal information you choose to provide to us, if you decide not to give us some of, or all, the personal information that requested, it may affect whether we can provide our services to you, for example:

- our ability to communicate effectively with you;
- our ability to provide products or services to you;
- your ability to participate in programs and competitions conducted by us;
- your ability to apply for employment or volunteer positions with us; and
- your eligibility to be insured under the National Gymnastics Insurance scheme.

PERSONAL INFORMATION COLLECTION REASONS

You may decide to provide personal information to us for a range of different reasons, for example:

- To be a gymnastics participant with us.
- To register a child in your family or under your guardianship for gymnastics activities with us.
- To attend our gymnastics activities or events, and to participate in activities during that event.
- To purchase a ticket to our gymnastics events.
- To attend our education courses and gain accreditation as a Technical Member.
- To be a Gymnastics Australia Technical Member.
- To apply for employment or volunteering with us.
- To access our systems and portals.
- To purchase our products and services.
- To provide services to us.
- Enter a competition or promotion being conducted by us.
- Requests information from us.
- Contacts us via email, telephone, mail or one of our websites.
- Engages with us via social media.
- If otherwise required by a local, state/territory or federal government agency/decreed.

HOW PERSONAL INFORMATION IS COLLECTED

We collect personal information about you in several ways including:

- Be affiliated to an AGE as an Athlete, Technical Member, Club Personnel or Staff Member.
- Enter your personal information or consent to your personal information to be entered into one of Gymnastics Australia's IT systems, including without limitation, Gymnastics Online, National Gymnastics CRM & Database, Learning Management System, Online Competition Registration System, or another IT system managed by us;
- Provide your personal information or agree to your personal information being provided by one of Gymnastics Australia's websites including without limitation <http://www.gymnastics.org.au/>, <http://www.freeg.org.au/>, <http://www.launch-pad.org.au/>, <https://gymnasticsworldcup.com.au/>, <http://ausgymnasticschamps.com.au/>, <https://www.nationalclubscarnival.com.au/>, <https://support.gymnastics.org.au/>, <https://www.fitterforlife.org.au/> or another website managed by us;
- Access one of Gymnastics Australia's websites including without limitation <http://www.gymnastics.org.au/>, <http://www.freeg.org.au/>, <http://www.launch-pad.org.au/>, <https://gymnasticsworldcup.com.au/>, <http://ausgymnasticschamps.com.au/>, <https://www.nationalclubscarnival.com.au/>, <https://support.gymnastics.org.au/>, <https://www.fitterforlife.org.au/> or another website managed by us.
- Contact us by email, telephone or mail;
- Engage with us via social media;
- Elect to receive our newsletters or other information;
- Register for employment or volunteering at an AGE;

- Are elected to the Board or Committee of an AGE
- Participate in any program, activity, competition or event that is being conducted by, or on behalf of, us;
- Purchase tickets to a gymnastics event from us or an authorised agent or licensee;
- Purchase merchandise from us or an authorised agent or licensee;
- Purchase other products or services from us or an authorised agent or licensee;
- Provide us with information in an application or consent form, survey, feedback form, incident report or complaint; and
- Where we are required to do so by law such as for education, child protection, work health and safety laws, charitable collections, medical treatment or other legislation in Australia

We will only collect personal information regarding a child under the age of 16 years from the parent or other 'responsible person' associated with that child. At times we may collect personal information regarding an adult from another 'responsible person' associated with that adult.

We may also collect and use personal information that is given to it by another Australian Gymnastics Entity or a third party in the course of its business, provided such collection and use is reasonably necessary for our or the third party's functions or activities, or legitimate interests. Examples of such third parties include the Fédération Internationale de Gymnastique (FIG), Sport Australia (including the Australian Institute of Sport (AIS)), the Australian Olympic Committee (AOC), Commonwealth Games Australia (CGA), law enforcement and regulatory bodies.

HOW WE USE PERSONAL INFORMATION

We, and third parties to whom we may disclose personal information in accordance with this Privacy Policy, may collect, hold and use your personal information for the primary purpose for which it was collected, and secondary purposes related to the primary purpose. Such primary and secondary purposes may include, without limitation, use of your personal information to:

- verify your identity;
- to complete, validate and retain child safety and/or other background checks;
- provide the services and/or communications you request from us;
- research, develop, run, administer and market competitions, education courses, programs, activities and other events relating to gymnastics;
- research and develop new products, services and merchandise relating to gymnastics.
- research, develop and market products, services, merchandise and special offers made available by us and third parties;
- respond to emergency situations involving or requiring medical treatment;
- to manage your relationships with Australian Gymnastics Entities;
- to assist other Australia Gymnastic Entities as is reasonably necessary for their functions or activities, or their legitimate interests;
- share relevant participant information with the Australian Institute of Sport, Australian Olympic Committee and other relevant bodies;
- administer, manage and provide you with registration and access to GA's website;
- keep you informed of news and information relating to various gymnastics events, activities and opportunities via various mediums;

- Inform you of important event-related information, for example time or event changes, transport information or related events;
- carry out market research and surveys;
- market products, services, merchandise and special offers made available by Australian Gymnastics Entities or our respective corporate partners, licensees, suppliers and sponsors;
- administer and manage our respective IT systems including Member Apps and provide you with access to those systems;
- track and analyse activity on our websites;
- data aggregation, enrichment, augmentation, processing, analytics and research;
- internal accounting and administration; and
- regulatory reporting and compliance.

INFORMATION STORAGE AND PROTECTION

We hold your Personal Information in both paper and electronic form in accordance with the GA Records Management & Retention Policy.

Much of the information we collect from and about our members is added to our National Gymnastics Database. When your information is entered into our National Gymnastics database, the information may be combined or linked with other information held about you.

Security of personal information is important to us. We have taken steps to protect the information we hold from misuse, loss, unauthorised access, modification or disclosure. Some of the security measures we use includes strict confidentiality requirements of our employees, volunteers, Australian Gymnastics Entities and service providers, security measures for system access and security measures for our website.

We seek to protect your personal information from any unauthorised loss, disclosure or access. However, if a serious data breach occurs, we must notify you as required under the Privacy Act regarding the circumstances of the breach, and must also advise the Office of the Australian Information Commissioner.

SENSITIVE INFORMATION

Sensitive information is afforded a higher level of privacy protection than other personal 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, we may also collect sensitive information such as:

- information about your health and medical history;

- information about disciplinary or child safety matters and their history; and
- other sensitive information about you (for example, information about your racial or ethnic origin or that of your parents).

We are required by law to obtain consent when collecting sensitive information. Australian Gymnastics Entities will assume consent to the collection of all sensitive information that is provided to it for use in accordance with this Privacy Policy, unless told otherwise.

We may use health information about you for insurance purposes and/or to ensure that gymnastics programs in which you participate are run safely and in accordance with any special health needs you may have. If you do not consent to the collection of your health and sensitive information (and we are not otherwise permitted under law to collect that information) please do not provide your health and sensitive information when prompted to do so.

In addition, we may use de-identified health information and other sensitive information to carry out research, to plan events and activities or to prepare submissions to government or a government body. De-identified information is information which has been aggregated or otherwise de-identified so that it cannot be used to identify you or any other individual.

WHEN DO WE DISCLOSE YOUR PERSONAL INFORMATION?

We may disclose your personal information:

- To Australian Gymnastics Entities.
- Our insurers.
- Our professional advisers, including our accountants, auditors and lawyers;
- To organisations other than Australian Gymnastics Entities involved in gymnastics and sporting programs and initiatives in Australia, including Sport Australia, Australian Institute of Sport (AIS), the Australian Olympic Committee (AOC).
- To Governmental bodies including without limitation the Australian, State & Territory Institutes of Sport, the Australian Sports Anti-Doping Authority, the National Sports Tribunal, the Australian Sports Commission, the Major Sporting Events Taskforce in the Australian Government's Department of Health and the Department of Immigration and Border Protection, federal, state and territory law enforcement and security agencies such as the Australian Security Intelligence Organisation, the Australian Federal Police, and State and Territory policing organisations, contracted service providers to the Australian Government, and other entities, government departments and agencies who have responsibilities that interact with Australia hosting the Event;
- To Fédération Internationale de Gymnastique (FIG)
- Companies that we have engaged or used to carry out functions and activities on our behalf, including companies involved in:
 - advertising and marketing our products, services, merchandise and special offers (including social media partners);
 - data aggregation, enrichment, augmentation, processing, analytics and research; and
 - the design, implementation, maintenance and hosting of any database on our behalf;

- Third party service providers. Gymnastics Australia WILL NOT disclose personal information captured in our membership database to a third party for purely commercial reasons. If a commercial arrangement is in place, information sharing will be limited to aggregated data.
- When required or authorised by law;
- To an enforcement body when reasonably necessary;
- To lessen or prevent a threat to an individual or public health or safety;
- With your express or implied consent.

Our service providers are not authorised by us to use or disclose your personal information except as necessary to perform services on our behalf or to comply with legislation. We may also disclose your personal information for the purposes of safety and security to relevant law enforcement bodies or for the purposes of planning events.

In some circumstances personal information may also be disclosed outside of Australia, for example, information disclosed to the FIG or International Gymnast magazine. In such circumstances, GA will use our 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.

When an Australian Gymnastics Entity provides other Australian Gymnastics Entities with personal information about individuals, we rely on the Australian Gymnastics Entity to make the individual aware that the information has been provided to other Australian Gymnastics Entities and for what purpose and to whom it may be disclosed and also how they can access their information. This is extremely important for particularly affiliated Club Owners provisioning the personal information of their members in the National Gymnastics Database.

DIRECT MARKETING

We 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 us has the option to refuse e-mail, SMS or posted offers.

If you do not wish to receive e-mail, SMS or posted offers from us, you may opt-out by using the link provided or in your member portal accessible via logging into www.gymnastics.org.au. Alternatively, you may contact our Privacy Manager at any time that you do not wish to receive e-mail, SMS or posted offers (however, information relating to the option to unsubscribe from those communications may be retained).

PRIVACY & OUR WEBSITES

We will not collect any personal information from your use of our website except when you knowingly provide it, or otherwise provide it via clickstream data, cookies and/or web beacons.

Clickstreams are used by us to allow us to monitor which areas of the Websites are most frequently visited. The information collected by a website host is used to administer and improve the performance of the Website and to better understand what is of interest to you. The information may include:

- the number of users visiting the Website and the number of pages viewed by such users;
- the date, time and duration of your visit;

- the IP address of your computer;
- your browser software; and
- your path taken through the Website.

In addition to this, we may use Cookies on our websites. Cookies are small text files that help a website to remember your preferences and improve your experience of using that website. Using cookies is standard practice for most large websites. In some cases, the cookies that we use may collect some personal information about you. This information is subject to this Privacy Policy and will be treated in the same way as other personal information we collect about you. If you prefer, you may be able to disable cookies on your internet browser. However, if you do so, you will not be able to enjoy the enhanced user experience that our cookies offer.

Web beacons are images that originate from a third-party site to track visitor activities. We may use web beacons to track the visiting patterns of individuals accessing a Website.

Websites linked to any of our websites are not subject to our privacy standards, policies or procedures. We cannot take any responsibility for the collection, use, disclosure or security of any personal information that you provide to a third-party website.

HOW TO CORRECT AND ACCESS PERSONAL INFORMATION

We take all reasonable steps to ensure that the personal information we collect, use and disclose is accurate, complete and up to date.

However, we rely on the accuracy of personal information as provided to us both directly and indirectly. You are encouraged to regularly review and update your personal information.

If you would like to access personal information that we hold about you, we require you to put your request in writing. If we do not allow you access to any part of the personal information we hold about you, we will tell you why.

If you provided your personal information via our IT Systems or Website, you can update your personal information in that IT System or Website at any time by logging onto the relevant IT System or Website and submitting the updated information.

Individuals may also request access to their personal information held by us by making a request via the contact details set out below. We will respond to your request for access within 14 days and endeavour to provide the requested information within 30 days. If you find that the personal information we hold about you is inaccurate, incomplete or out-of-date, please contact us immediately via privacy@gymnastics.org.au and we will see that it is corrected.

CONTACTING US REGARDING PRIVACY MATTERS

Each Australian Gymnastics Entity is responsible for protecting the personal information that it holds about you in accordance with this Policy. If you have any queries, we recommend contacting the relevant responsible Australian Gymnastics Entity directly in the first instance.

Please contact privacy@gymnastics.org.au:

- to request access to the personal information that we hold about you;
- for issues or complaints in relation to the collection, use, disclosure, quality, security of and access to your personal information;
- for further information regarding our management of personal information; or
- if you simply require further information about this Policy,

Alternatively, you can write to Gymnastics Australia's Privacy Manager at 3/100 Albert Rd, South Melbourne, VIC, 3205.

We each take all privacy complaints seriously and will investigate your complaint in a confidential manner. We will respond to your complaint within 30 days and try to resolve it within 90 days. Gymnastics Australia may refer your correspondence to the relevant Australian Gymnastics Entity if necessary, to ensure a timely response.

If we are unable to resolve your complaint or you are unhappy with the outcome, you can contact the Office of Australian Information Commissioner via its enquiries line 1300 363 992 or website (<https://www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint>) to lodge a complaint.

CHANGES TO THE POLICY

From time to time, we may need to change this Privacy Policy to reflect our changing business practices. Changes will be approved by Gymnastics Australia's Board of Directors.

We will notify you of any amendments by posting an updated version of this Privacy Policy on our website gymnastics.org.au and circulate via email to all Affiliated State Gymnastics Association Members.