

SLSQ Policy

Title: Privacy	Version: 1
Effective Date: 27.03.2014	Approved Date: 26.03.2014
Revision Date: 1.03.2017	Approved by: SLSQ Board of Directors

Introduction

The protection of personal information is important to Surf Life Saving Queensland (herein after "SLSQ"). SLSQ is committed to respecting the right to privacy and the protection of personal information.

Privacy in Australia is primarily governed by the *Privacy Act*.

On 29 November 2012, the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* (**Amendment Act**) was passed by government. The new *Amendment Act* introduced several important changes to the old *Privacy Act*. These changes commence as from 12 March 2014.

Primarily, the *Amendment Act* includes a set of harmonised, privacy principles that regulate the handling of personal information by both Australian Government agencies and businesses and associations (the **APPs**). The APPs replace the existing two-part system: comprising the Information Privacy Principles (IPPs) that deal with government agencies; and the National Privacy Principles (NPPs) that deal with businesses and associations.

In short, the changes in the *Amendment Act* result in significant changes to the regulation of privacy in Australia including:

- (i) the creation of thirteen (13) new Australian Privacy Principles regulating how private and public sector entities handle personal information;
- (ii) significant enhancement of the Commissioner's powers; and
- (iii) the introduction of a civil penalty regime for breaches of the *Privacy Act*

Purpose

SLSQ acknowledges the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* ("the Act"). The purpose of this policy is to provide a framework for effective management and compliance with the Australian Privacy Principles (APPs) as described the Act.

This policy provides for the way in which SLSQ, its affiliated Branches and Clubs (SLSQ Affiliates) may collect, use, store and disclose information. Third party commercial entities and subsidiaries, whether owned or acting on behalf of SLSQ or an affiliate or not, may be subject to the same privacy laws and may be governed by their own privacy policies. SLSQ will always do its utmost to ensure that personal information is respected and protected.

Application

This policy applies to:

- the personal and sensitive information SLSQ collects;
- how SLSQ collects personal and sensitive information;
- how SLSQ uses or discloses personal and sensitive information;
- how to access or seek correction of information held by SLSQ ; and
- who to contact regarding privacy issues and complaints

Definitions

Personal information is information or an opinion (including information or an opinion forming part of a database) from which it is possible to determine someone's identity.

Sensitive information is a type of personal information that also includes information or an opinion about:

- 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.

Legislative Framework

Privacy Amendment (Enhancing Privacy Protection) Act 2012

Policy

By providing your personal information to SLSQ, you consent to its use, storage and disclosure in accordance with this Privacy Policy.

What personal and sensitive information does SLSQ collect?

Personal Information

The information collected by a SLSQ about a particular person will vary depending on the circumstances of collection. It may include, but is not limited to, a person's contact details (name, email and/or postal address, phone number), date of birth, gender, credit card details, driver licence number, passport number, insurance details, employment history, qualifications or communication history with SLSQ.

Sensitive Information

If it is reasonably necessary in the circumstances, SLSQ may also collect sensitive information such as a person's medical history, nationality, their ethnic background or disabilities.

SLSQ is required by law to obtain consent when collecting sensitive information. SLSQ 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.

How does SLSQ collect personal and sensitive information?

Information may be collected when you:

- become a member of a surf life saving club, association or other body which is a member or affiliated with SLSQ;
- subscribe to any publication of SLSQ or an SLSQ Affiliate, including electronic publications;
- provide details to SLSQ or an SLSQ Affiliate in an application form, consent form, survey, feedback form or incident report;
- enter personal information into, or agree to having your personal information entered into, one of SLSQ's online systems or online system used by SLSQ such as 'SurfGuard' or another SLSQ online system;
- access the SLSQ website;
- contact SLSQ via email, telephone or mail or engage with SLSQ via social media;
- participate in any program, activity, competition or event run by SLSQ or an SLSQ Affiliate;
- purchase tickets to a surf life saving or sporting event from SLSQ or an authorised agent;
- purchase merchandise, products or services from SLSQ or an authorised agent or licensee;
- are elected or appointed to the Board or a committee of SLSQ or an SLSQ Affiliate;
- apply for employment or a volunteer position with SLSQ or an SLSQ Affiliate; or
- where SLSQ is required to do so by law (for education, VET training, child protection, work health and safety laws, AVETMISS, charitable collections, Good Samaritan, Medical Treatment or other legislation in Australia).

Providing information

Depending on the circumstances, some types of information will be required and others might be optional. If you do not provide some or all of the information requested, this may affect SLSQ's ability to communicate with you or provide the requested products or services.

By not providing requested information, you may jeopardise your ability to participate in programs or competitions or apply for employment or volunteer positions with SLSQ or an SLSQ Affiliate. If it is impracticable for SLSQ to deal with you as a result of you not providing the requested information or consents, SLSQ may refuse to do so.

Collection from third parties

SLSQ or an SLSQ Affiliate may collect personal information regarding a child from the parent or other responsible person associated with that child.

In some circumstances, SLSQ collects information from SLSQ Affiliates or other third parties.

Examples of such third parties could include, without limitation, the Australian Institute of Sport, the Australian Olympic Committee, non-affiliated surf life saving organisations or government and law enforcement bodies.

Information storage and protection

SLSQ stores information in different ways, including in paper and electronic form. Much of the information we collect from and about our members is added to our 'SurfGuard' database which is hosted by a third party data storage provider. When your information is entered into the SurfGuard or VETtrak database, the information may be combined or linked with other information held about you.

Security of personal information is important to SLSQ. SLSQ has taken steps to protect the information we hold from misuse, loss, unauthorised access, modification or disclosure. Some of the security measures SLSQ uses include strict confidentiality requirements of our employees, volunteers, SLSQ Affiliates and service providers, as well as security measures for system access, and security measures for our website such as firewalls and system encryption.

How does SLSQ use and disclose personal and sensitive information?

Use

SLSQ, and third parties to whom we may disclose personal information in accordance with this Privacy Policy, may use your personal information to:

- (a) verify your identity;
- (b) complete background checks;
- (c) research, develop, run, administer and market competitions, programs, activities and other events relating to a variety of surf life saving sports and activities including but not limited to 'Nippers', 'Rescue and Resuscitation' events, Ironman and Ironwoman competitions, emergency management information, membership management, education offerings and organisation, social events, police or other legal agencies for the purposes of medical treatment amongst others;
- (d) research, develop and market products, services, merchandise and special offers made available by us and third parties;
- (e) respond to emergency situations involving or requiring medical treatment;
- (f) administer and manage SurfGuard, VETtrak and Surfmate databases and provide you with access to sls.com.au , and self service portal and other IT based applications; and
- (g) keep you informed of news and information relating to various surf life saving events, activities and opportunities via various mediums.

SLSQ may use health information to ensure that programs we operate are run safely and in accordance with any special health needs participants may require. Health information may also be kept for insurance purposes. In addition, we may use de-identified health information and other sensitive information to carry out research, to prepare submissions to government or other regulatory bodies, or to plan events and activities.

Disclosure

SLSQ may disclose your personal information to a range of organisations which include, but are not limited to:

- SLSQ Affiliates and other organisations involved in surf life saving and emergency management;
- companies we engage to carry out functions and activities on SLSQ's behalf, including direct marketing;
- our professional advisers, including our accountants, auditors and lawyers;
- our insurers;
- SLS companies, subsidiaries and affiliates; and
- relevant sporting bodies such as the Australian Sports Commission, the Australian Sports Anti-Doping Authority, the Australian Olympic Committee, the Australian Paralympic Committee, the Australian Commonwealth Games Association, Australian Institute of Sport, Australian Sports Anti-Doping Authority, various national sporting bodies, and federal and state departments of sport amongst others; and in other circumstances permitted by law.

In some circumstances, personal information may also be disclosed outside of Australia. In such circumstances, SLSQ will use its 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.

Direct marketing

We will assume consent to use non-sensitive personal information to provide to you better services and marketing purposes (including disclosure of such information to service providers).

Every person whose data is collected by SLSQ has the option to refuse e-mail, SMS or posted offers. Members may do this by updating the direct marketing settings in the user portal in SurfGuard, or via the opt-out procedures included in any communication from us (information relating to the option to unsubscribe from those communications may be retained).

If you are still not satisfied with the communication you are receiving, you can also write to SLSQ's Administration and Compliance Manager via the contact details set out below.

Other disclosures

In addition, SLSQ may also disclose personal information:

- (a) with your express or implied consent;
- (b) when required or authorised by law;
- (c) to an enforcement body when reasonably necessary; or
- (d) to lessen or prevent a threat to an individual or public health or safety.

SLSQ website

When users visit the SLSQ website, our systems may record certain information about their use of the site, including the web pages visited and the time and date of their visit. SLSQ uses this information to help analyse and improve the performance of the SLSQ website.

In addition, we may use “cookies” on the SLSQ website. Cookies are small text files that help a website to remember the preferences of users to improve the experience of using that website. In some cases, the cookies that we use may collect some personal information. SLSQ will treat this information in the same way as other personal information we collect. You are free to disable cookies on your internet browser to prevent this information being collected; however, you may lose the benefit of an enhanced website experience that the use of cookies may offer.

Websites linked to the SLSQ website are not subject to SLSQ's privacy standards, policies or procedures. SLSQ does not take any responsibility for the collection, use, disclosure or security of any personal information that you provide to a third party website.

Accessing and seeking correction of information held by SLSQ

SLSQ will take all reasonable steps to ensure that the personal information it collects, uses or discloses is accurate, complete and up-to-date. However, we rely on the accuracy of personal information as provided to us both directly and indirectly.

SLSQ also relies on Affiliates and volunteers to enter data and make their best endeavours to ensure data is accurately recorded.

We encourage all members to regularly review and update their personal information on the SurfGuard database and via the "Members Portal" link.

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 and we will see that it is corrected.

Resolving privacy issues and complaints

Any issues or complaints in relation to the collection, use, disclosure, quality, security of and access to your personal information may be made to the SLSQ Privacy Officer at this address:

Administration and Compliance Manager
SLSQ
PO Box 3747, South Brisbane Qld 4101
Email: info@lifesaving.com.au
Phone: +61(07) 3846 8000.

We will respond to your complaint within 30 days and try to resolve it within 90 days. If we are unable to resolve your complaint within this time, 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 <http://www.oaic.gov.au/> to lodge a complaint.

For further information on SLSQ's management of personal information, please contact SLSQ.

SLSQ may amend this Privacy Policy from time to time.