

# Privacy Policy

## 1.0 INTRODUCTION

- 1.1 The protection of personal information is important to Paddle Australia (PA), its State Paddle Associations (SPAs) and affiliated Paddling Clubs, and this policy affirms the commitment to respecting the right to privacy and the protection of personal information.
- 1.2 Within this policy, reference to **Paddling Organisations** refers collectively to PA, the SPAs and the affiliated Paddling Clubs that have actively adopted this policy. Reference to **Paddling Organisation** means the individual / specific organisation which is receiving or disclosing the personal and/or sensitive information.

## 2.0 PURPOSE

- 2.1 This policy sets out:
- a) what personal and sensitive information Paddling Organisations collect;
  - b) how Paddling Organisations collect personal and sensitive information;
  - c) how Paddling Organisations use or disclose personal and sensitive information;
  - d) how individuals can access or seek correction of information held by Paddling Organisations; and
  - e) who to contact regarding privacy issues and complaints.
- 2.2 By individuals providing their personal information to a Paddling Organisation, they consent to its use, storage and disclosure in accordance with this policy.
- 2.3 This policy provides for the way in which Paddling Organisations may collect, use, store and disclose information. Third party commercial entities and subsidiaries, whether owned or acting on behalf of a Paddling Organisation or not, may be subject to the same or similar privacy laws and may be governed by their own privacy policies. Paddling Organisations will always do their utmost to ensure that personal information is respected and protected.

## 3.0 SCOPE

- 3.1 This policy applies to all employees, independent contractors, work experience students and other volunteers, consultants and others engaged by Paddling Organisations (**Users**) who have access to personal information in the course of performing their duties.

## 4.0 WHAT PERSONAL AND SENSITIVE INFORMATION IS COLLECTED?

### 4.1 Personal Information

- 4.1.1 Generally, 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, whether true or not.
- 4.1.2 The information collected by a Paddling Organisation 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 a Paddling Organisation.

## 4.2 Sensitive Information

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

- a) racial or ethnic origin;
- b) political opinions;
- c) membership of a political association, professional or trade association or trade union;
- d) religious beliefs or affiliations or philosophical beliefs;
- e) sexual preferences or practices;
- f) criminal record; or
- g) health, genetic information or disability.

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

4.2.3 Paddling Organisations are required by law to obtain consent when collecting sensitive information. A Paddling Organisation assumes, and will assume, consent to the collection of all sensitive information that is provided to it for use in accordance with this Privacy Policy, unless an individual expressly tells us otherwise.

## 5.0 HOW IS PERSONAL AND SENSITIVE INFORMATION COLLECTED?

5.1 Information may be collected by a Paddling Organisation when an individual:

- Becomes a member of a Paddling Organisation or other body which is a member of or affiliated with a Paddling Organisation;
- Subscribes to any publication of a Paddling Organisation, including electronic publications;
- Provides details to a Paddling Organisation in an application form, consent form, survey, feedback form or incident report;
- Enters personal information into, or agrees to having their personal information entered into, a Paddling Organisation's online system;
- Accesses a Paddling Organisation website;
- Contacts a Paddling Organisation via email, telephone or mail or engages with a Paddling Organisation via social media;
- Participates in any program, activity, competition or event run by a Paddling Organisation;
- Purchases tickets to a Paddling Organisation event from a Paddling Organisation or an authorised agent;
- Purchases merchandise, products or services from a Paddling Organisation

- Is elected or appointed to the Board or a committee of a Paddling Organisation;
- Applies for employment or a volunteer position with a Paddling Organisation; or
- Where a Paddling Organisation 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).

A Paddling Organisation may provide a link to this Privacy Policy at each point of collection.

## 5.2 Providing Information

- 5.2.1 Depending on the circumstances, some types of information will be required and others might be optional. If some or all of the information requested is not provided, this may affect a Paddling Organisation's ability to communicate or provide the requested products or services.
- 5.2.2 Not providing requested information to a Paddling Organisation, may jeopardise an individual's ability to participate in programs or competitions or apply for employment or volunteer positions with a Paddling Organisation. If it is impracticable for a Paddling Organisation to deal with an individual as a result of not providing the requested information or consents, the Paddling Organisation may refuse to do so.

## 5.3 Collection From Third Parties

- 5.3.1 A Paddling Organisation may collect personal information regarding a child from the parent or other responsible person associated with that child.
- 5.3.2 In some circumstances, a Paddling Organisation may collect information from other Paddling Organisations or other third parties. Examples of such third parties could include, without limitation, Australian Sports Commission (ASC), Sport Integrity Australia (SIA), Australian Olympic Committee (**AOC**), Paralympics Australia and other NSO's and other non-affiliated paddle organisations or government and law enforcement bodies.

## 5.4 Information Storage and Protection

- 5.4.1 Paddling Organisations store information in different ways, including in paper and electronic form. Much of the information collected from and about members is added to a Paddling Organisation's database which is hosted by a third-party data storage provider. When information about an individual is entered into a Paddling Organisation's database, the information may be combined or linked with other information held about that individual.
- 5.4.2 Security of personal information is important to the Paddling Organisations. The Paddling Organisations have taken steps to protect the information held from misuse, loss, unauthorised access, modification or disclosure. Some of the security measures used include strict confidentiality requirements of employees, volunteers, Paddling Organisation affiliates and service providers, as well as security measures for system access, and security measures for our website such as firewalls and system encryption.
- 5.4.3 Paddling Organisations are required to comply with the Federal Government Notifiable Data Breaches Scheme (NDBS). If Users are aware of or reasonably suspect a data breach, they must report the actual or suspected data breach to the Privacy Officer as soon as reasonably practicable and no later than 24 hours after becoming aware of the actual or suspected data breach. When a data breach occurs that could result in serious harm, the relevant Paddling Organisation will notify the individual(s) that are affected. The Paddling Organisation, when notifying the individual(s) and the Australian

Information Commissioner, will also outline what steps will be undertaken in response to the breach. A review of the breach will be undertaken, and action(s) implemented to prevent a future breach.

## 6.0 HOW IS PERSONAL AND SENSITIVE INFORMATION USED AND DISCLOSED?

### 6.1 Use

6.1.1 Paddling Organisations, and third parties to whom we may disclose personal information in accordance with this policy, may use personal information to:

- (a) verify identity;
- (b) complete background checks;
- (c) research, develop, run, administer and market competitions, programs, activities and other events relating to Paddle sports, membership management, education offerings, 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, manage and provide access to Paddling Organisation websites and other IT based applications; and
- (g) keep individuals informed of news and information relating to various paddle events, activities and opportunities via various mediums.

6.1.2 Paddling Organisations may use and store health information:

- (h) to ensure that programs it operates are run safely and in accordance with any special health needs participants may require;
- (i) for competition classification purposes; or
- (j) for insurance purposes.

In addition, Paddling Organisations 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. Paddling Organisations do not provide a “health service” as defined under the *Privacy Act 1988* and will not use health information for the purposes of providing a “health service” as defined under the *Privacy Act 1988*.

### 6.2 Disclosure

6.2.1 A Paddling Organisation may disclose personal information to a range of organisations including, but not limited to:

- a) another Paddling Organisation;
- b) companies engaged to carry out functions and activities on behalf of a Paddling Organisation, including direct marketing;
- c) our professional advisers, including our accountants, auditors and lawyers;
- d) our insurers;

- e) police and other legal agencies;
- f) Paddling Organisation companies, subsidiaries, affiliates, disciplinary committees, tribunals or investigative bodies; and
- g) sporting bodies such as ASC, SIA, AOC, Paralympics Australia, Commonwealth Games Australia, other NSO's and Federal and State Departments of sport amongst others; and in other circumstances permitted by law.

6.2.2 In some circumstances, personal information may also be disclosed outside of Australia. In such circumstances, all Paddling Organisations will use their 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.

6.2.3 Any disclosure will be on such terms and conditions as the Paddling Organisation determines, considering the circumstances of the disclosure but always with the best interests of the parties whose personal information is being disclosed.

### 6.3 Direct Marketing

6.3.1 Paddling Organisations assume, and will assume, an individual's consent to use non-sensitive personal information to provide better services and marketing purposes (including disclosure of such information to service providers). If an individual does not so consent to Paddling Organisations use of non-sensitive personal information for marketing purposes, they must advise the Paddling Organisation.

6.3.2 Every person whose data is collected by a Paddling Organisation has the option to refuse e-mail, SMS or posted offers by updating the opt-in settings in the Paddling Organisations database (if offered) 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).

6.3.4 If an individual is still not satisfied at the communication being received, they can write to PA's Privacy Officer via the contact details set out below.

### 6.4 Other Disclosures

6.4.1 A Paddling Organisation may also disclose personal information:

- (a) with express or implied consent from the individual;
- (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.

### 6.5 Paddling Organisations Website

6.5.1 When users visit a Paddling Organisation website, the website systems may record certain information about their use of the site, including the web pages visited and the time and date of their visit. Paddling Organisations may use this information to help analyse and improve the performance of their website.

6.5.2 In addition, some Paddling Organisation websites may use "cookies". 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 the Paddling Organisations use may collect some personal information. Paddling Organisations will treat this information in the same way as other personal information it collects. Cookies can be disabled on a users' internet browser to prevent this information being collected.

Loss of benefit of an enhanced website experience that the use of cookies may offer may occur.

- 6.5.3 Websites linked to a Paddling Organisation's website are not subject to the Paddling Organisation's privacy standards, policies or procedures. No responsibility is taken by any Paddling Organisation for the collection, use, disclosure or security of any personal information provided to a third-party website.

## 7.0 ACCESSING AND SEEKING CORRECTION OF INFORMATION HELD

- 7.1 Paddling Organisations will take all reasonable steps will be taken to ensure that the personal information collected, used or disclosed under this policy is accurate, complete and up to date. Paddling Organisations however, rely on the accuracy of personal information as provided both directly and indirectly.
- 7.2 Paddling Organisations rely on individuals to enter data and make their best endeavours to ensure data is accurately recorded. If personal information changes, it should be updated in the Paddling Organisation's database.
- 7.3 All individuals are encouraged to regularly review and update their personal information provided to and/or stored with a Paddling Organisation via the Membership & Events Portal ([click here](#)).
- 7.4 Individuals may also request access to their personal information held by a Paddling Organisation by making a request via the contact details set out below. The Paddling Organisation will respond to a request for access within fourteen (14) days and endeavour to provide the requested information within thirty (30) days. If an individual finds that the personal information held by a Paddling Organisation is inaccurate, incomplete or out-of-date, they should contact the Paddling Organisation immediately so that can be corrected.

Subject to any Australian law, or a court/tribunal order, requiring a Paddling Organisation to retain the information, the Paddling Organisation will delete or de-identify information that is no longer needed.

## 8.0 RESOLVING PRIVACY ISSUES AND COMPLAINTS

- 8.1 Any issues or complaints in relation to the collection, use, disclosure, quality, security of and access to personal information may be made to the Paddling Organisations Privacy Officer.

Contact details for the Paddle Australia Privacy Officer are:

Privacy Officer

Email: [info@paddle.org.au](mailto:info@paddle.org.au)

Ph: 1300 232 398

Privacy Officer  
Paddle Australia  
PO Box 6805  
Silverwater NSW 2128



- 8.2 The Paddling Organisation will respond to a complaint within thirty (30) days and try to resolve it within ninety (90) days. Should the Paddling Organisation be unable to resolve a complaint within this time, or the individual is unhappy with the outcome, they 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.
- 8.3 For further information on the Paddling Organisations management of personal information, please contact the Paddling Organisation.
- 8.4 The Paddling Organisation may amend this Privacy Policy from time to time.

## **9.0 BREACH OF THIS POLICY**

- 9.1 All Users are required to comply with this policy as amended, varied or replaced from time to time.
- 9.2 Any User who is found to have breached this policy may be subject to disciplinary action, up to and including termination of employment or engagement with the Paddling Organisation.