



# Privacy Policy



## Revision History

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## Policy overview and purpose

The Crows Supporters Group Incorporated (CSG) is committed to complying with the principles set out in the Privacy Act 1988 (Cth) (Privacy Act) and the Australian Privacy Principles. This policy has been developed to allow the CSG to comply with these requirements.



## Coverage

This policy applies to all persons who are involved with the activities of the CSG, whether they are in a paid or unpaid/voluntary capacity and include, but not limited to:

- Financial members of all categories,
- Life members of the CSG,
- Persons appointed or elected to committees and sub-committees.

## Scope

This Privacy Policy governs our collection, storage, management, protection, use and disclosure of personal information obtained from sources, including, but not limited by:

- Using the CSG website,
- Using the CSG social media sites, for example Facebook<sup>®</sup> page,
- Applying for membership of the CSG,
- Provided directly to the CSG, its officers, agents or employees,
- Recording of a person's image.

After this Privacy Policy has been brought to your attention, you acknowledge and consent to the use, collection, storage or disclosure of your personal information by us in accordance with this Privacy Policy, the Privacy Act and the Australian Privacy Principles, unless you personally notify us of your non-consent and/or non-agreement with this policy, or any aspect of it.

If you do not agree to us handling your personal information in the manner set out in this Privacy Policy, you must notify us and not provide us with any of your personal information, for example cease using the CSG website or Facebook<sup>®</sup> page.

## Policies

### General

The CSG and members must adhere to the policies and guidelines in this document to protect the privacy of the CSG or its business, products, competitions, teams, participants, services, events, sponsors, members and reputation.



## How do you notify us of your non-consent and/or non-agreement with this policy?

An individual may notify us of their non-consent and/or non-agreement to their personal information being used in accordance with all or part of this policy by:

- Responding to privacy notifications we make to individuals, for example responding to correspondence we send an individual upon joining the CSG notifying them of this policy,
- Directly notifying us at any time of their specific requests in regard to collection and use of their personal information, for example writing to the CSG Secretary or President.

## What is personal information?

We adopt the definition of personal information given in the Privacy Act:

*personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not.*

## Why does the CSG collect and hold personal information?

We only collect information that we require to conduct our operations and achieve our objectives.

We collect and maintain personal information in order to:

- Communicate with members and others interested in our activities,
- Promote our activities to members and others interested in our activities,
- Recording of our activities for historical purposes,
- Other activities that we consider will assist us to achieve our objectives.

## What kinds of personal information might we collect and hold?

We may collect (and hold) different personal information from you depending upon how you interact with us and your participation in our activities, for example, if you access our website, we may collect information about how you have used our website, if you attend one of our activities, we may collect your image.

If you contact us, we may collect details which include, but are not limited to, your name, address, e-mail address and phone number.

We may also collect information about:

- Your attendance at events arranged or sponsored by the CSG, and your participation in the CSG activities,
- Your views on our activities for improvement purposes,



- Our interactions,
- The technology you use to access our services,
- Your image via photographs or videos we take at our activities.

### **How do we collect your personal information?**

We collect personal information about you in a number of ways, including:

- Directly from you, for example, when you provide information to us by phone, email, in an application form or through our website,
- When you post about us on social media,
- When you enter a competition,
- When we take your photograph at CSG activities,
- From third parties, such as AFC and various other state and territory supporter associations (Other Supporter Associations).

Where possible, we collect this information from the individual concerned. If we receive unsolicited personal information, we will assess whether we would have been entitled to collect that personal information and, if not, destroy or de-identify that personal information.

### **Recording and use of images**

The practices and principles specified in this policy apply to persons authorized to record images on behalf of CSG and the sanctioned use of images recorded by such authorized persons. Images recorded by individuals attending a CSG activity are not covered specifically by this Policy. We recommend individuals recording images on their own behalf follow the principles and practices defined in this policy and the CSG Social Media policy.

We will apply the following practices to the taking and use of images, for example the taking of photographs or video and posting on our website or Facebook© page, of individuals who we know to be under the age of 18 years:

- We will not record the image of an individual under the age of 18 years without the specific approval of one parent of that individual and the approval of the individual,
- We will not use the image of an individual under the age of 18 years without the specific approval of one parent of that individual and the approval of the individual.

We will apply the following practices to the taking and use of images, for example the taking of photographs or video and posting on our website or Facebook© page, of individuals over the age of 18 years:

- We will not record the image of any individual who indicates or notifies us that they do not want their image recorded,
- We will not use the image of an individual who indicates or notifies us that they do not want their image used,



- A person or individual may indicate or notify us of their wishes by personal request, for example, indicating to the person recording images on our behalf that they do not want their image recorded at the time,
- We will honour individuals wishes, to the best of our ability, with respect to the recording and use of an individual's image,
- Where possible, we will ensure group images do not include the image of an individual who has indicated to us that they do not want their image recorded and any group/non-specific images that do include the image of such individuals are not used,
- We assume that an individual who has not made such a request to us consents to their image being recorded and used in accordance with this policy and our Social Media policy.

We will manage and use images we record for the purposes outlined in, and in a manner described, here and elsewhere in this policy.

### **How do we collect, hold, use and disclose your personal information?**

We and the other Supporter Group Associations, to whom we may disclose your personal information in accordance with this Privacy Policy, may use your personal information in order to:

- Develop a members' register to enable us to maintain contact with our members,
- Assess any application you make (e.g. for membership, etc.),
- Manage our relationship with you (e.g. contact you, etc.),
- Keep you informed of news and information relating to the CSG so that we may achieve our objectives, for example distributing newsletters, publications and other communications via various media,
- Administer and manage our respective websites and provide you with access to those websites,
- Provide you with information about our activities,
- Promote our activities, for example posting photographs and video on our website and social media platforms.

Our use of personal information may extend beyond these uses but will be restricted to purposes that we consider to be related to our functions and activities designed to allow us to achieve our objectives (as defined in the CSG Constitution).

### **What do we do with your personal information?**

If we collect personal information from you, we may:

- Use it for any of the purposes described in this Privacy Policy,
- Store it in accordance with this Privacy Policy.



Personal information that we collect directly from you in order to create and maintain our members' database will not be disclosed to third parties.

Personal information that we collect from you for purposes other than for the maintenance of our members' database and from third parties may be disclosed to:

- Adelaide Football Club,
- Australian Football League,
- Other Supporter Group Associations.

### **Health and sensitive information**

In some circumstances we may collect information about your health.

We do not generally collect health information, however in some circumstances we may collect and use health information about you to ensure that you have appropriate access and viewing facilities for events. Further, we may use health information about you to ensure that activities in which you participate are run safely and in accordance with any special health needs you may have, and for insurance purposes. We will not disclose information about your health to third parties, except as required by law.

In addition, we may use de-identified health information and other sensitive information to carry out research, to prepare submissions to government or a government body or to plan events and activities. De-identification involves the removal of any information from a record by which you may be identified.

### **Accuracy of your personal information**

We take all reasonable precautions 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. If you find that the personal information, we hold about you is incorrect, incomplete or out-of-date, please contact us immediately (our contact details are set out below) and we will take reasonable steps to ensure that it is corrected.

Personal information stored in the CSG Website database will not be updated by the CSG Administrator(s).

### **How do we hold and secure your personal information?**

We take reasonable steps to protect the personal information we collect from misuse, interference, loss, unauthorized access, modification or disclosure and make sure that personal information is stored securely.





Those steps include storing paper records in a physically secure place and using appropriate access controls in relation to our information systems.

Personal financial information will be obtained from an individual for the purpose of making payments to that individual only and we will minimize the likelihood of it being obtained and misused by another person, by:

- Obtaining the information using voice phone conversations and not methods susceptible to hacking, for example, email, websites, Facebook,
- We will not store or otherwise record the information on an ongoing basis,
- The information will be used for making the payments in a banking system, which employs encryption technologies.

We maintain physical, electronic, and procedural security measures to safeguard personal information including:

- Use of appropriate computer system and network security,
- Contingency plans assessing critical system functions and establishing data backup, disaster recovery and emergency mode operations plans.
- Information access controls, including policies and procedures for access authorization to the system and the various kinds of data it contains,
- Limiting access to our database to office bearers of the CSG (refer to constitution for details),
- Limiting the copies of your images to the photographer and individuals responsible for promotion of the CSG and authorized to administer the CSG website and social media sites.

## Your access rights

We will take reasonable steps to ensure personal information we collect, and use is accurate, up-to-date and complete. Subject to some exceptions at law, you are entitled to make a request to access your personal information. We encourage you to update and correct any of your personal information that we hold.

You may request access to the personal information that we hold about you by contacting us. If your personal information is not accurate, up-to-date or complete, we will take reasonable steps to ensure that the information is corrected.

## Our website

In addition to information entered into our website, the site automatically collects two types of information.

First, we may from time to time collect information relating to use of our website, such as which pages are requested and accessed, and which browser software is being used. This information enables us to identify the areas of the site, which are popular and tailor the site accordingly.



Secondly, we make use of a web browser software feature known as “cookies” which causes the user’s web browser software to store small pieces of textual information on a user’s computer. A cookie helps us to recognize when you re-visit the website, and to optimize your experience. This feature allows us to make our site more useful by appearing to remember information about a user during and between visits. The cookie is stored on your machine but does not identify you or give us any information about your computer. We do not collect any personal information from you when you use cookies on our website.

### **What happens if you have a question or complaint about how we have handled your personal information?**

If you have a question or complaint, you can raise it with us by:

- Contacting the CSG via the website at: <http://crows.com.au/>, or
- Writing to: The Crows Supporters Group, PO Box 7228, West Lakes SA 5021.

We take all complaints seriously and will respond to you within a reasonable period of time, unless we consider your complaint to be frivolous or vexatious.

If you aren’t satisfied with the way we have handled your complaint, you can make a complaint to the Office of the Australian Information Commissioner at <http://oaic.gov.au>.

### **Changes to the Privacy Policy**

From time to time we may need to change this Privacy Policy in line with our business practices. Changes come into effect from the time when they are brought to your attention, or when you next log onto our website, whichever is earlier. Please make sure you review this Privacy Policy each time you visit our website to keep up to date on any changes.

### **Further Information**

For further information about the CSG’s use of personal information, or to request access to the information we might hold about you, please contact the CSG via email at: [secretary@crows.com.au](mailto:secretary@crows.com.au) or write to us at The Crows Supporters Group, PO Box 7228, West Lakes SA 5021.