



# Gladesville Hornsby Football Association Inc

## Privacy Policy

### 1. Gladesville Hornsby Football Association

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Gladesville Hornsby Football Association Inc (ABN 25 328 153 207) of Christie Park, Christie Rd, Macquarie Park NSW 2113 aims to foster and develop the game of Association football in the North Western districts of Sydney by organizing competitions for junior and senior teams, and to foster and support the development of Gladesville-Hornsby Football Association Inc in competitions conducted by Football NSW Limited where appropriate.

Spirit Football Club (ABN 34 649 446 492) is the body through which GHFA enters teams in some Football NSW competitions.

Gladesville Hornsby Football Association Inc and Spirit Football Club (referred to in this policy as **we, us** and **GHFA**) is committed to managing your information in a secure and responsible manner and in accordance with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles introduced by the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* (Cth). This Policy sets out the way in which GHFA collects, uses and discloses personal information and also explains your rights and how to contact us.

### 2. Your Personal Information

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2.1 In the course of its operations, GHFA may collect, use and disclose the personal information of players, referees, club and team officials, coaches, ticketholders, administrators, participants and other individuals for the purpose of governing and administering the sport of football in the GHFA area and as further described in the remainder of this Policy. In each case, the precise nature of the collection, use and disclosure of personal information by GHFA depends on the services you request and receive from, and your interaction with, GHFA.

- 2.2 The types of personal information held by GHFA may include your name, address, phone numbers, email address, date of birth, gender, occupation, educational institution, educational qualifications, coaching and refereeing qualifications, employment history, disciplinary history, driver's licence, birth certificate, visa information and social media details. Depending on the services you receive from GHFA, GHFA may also collect and hold details about your participation history, membership history and credit card information, and details of the items ordered or purchased from GHFA.
- 2.3 In certain circumstances, GHFA may collect information about your health or other sensitive information about you (for example, information about your racial or ethnic origin or information about your physical health). GHFA may use health information about you to ensure that football programs in which you participate are run safely and in accordance with any special health needs you may have and for insurance purposes. GHFA may also use health information as required by the FNSW and/or FFA Statutes, including medical and anti-doping testing and investigations.
- 2.4 In addition, GHFA may use health information and other sensitive information which has been de-identified to carry out research, to prepare submissions to government or a government body or to plan events and activities. 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.
- 2.5 When you provide GHFA with personal information, this Policy will apply to the manner in which the information is collected, used, disclosed and stored by GHFA. If you chose not to provide certain personal information, GHFA may not be able to communicate with you. It may also affect GHFA's ability to provide you with the products and services you require. For example, you may not be able to participate in some of the activities on the GHFA network of websites (collectively, the **GHFA Sites**) if you do not provide certain personal information.

### **3. Collecting Your Personal Information**

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- 3.1 Personal information about you may be collected by GHFA from you or from a third party. GHFA uses forms, online portals and other electronic or paper correspondence to collect this information.
- 3.2 For example, GHFA may collect personal information from you:
- (a) via the GHFA Sites;
  - (b) when you provide it to GHFA by filling in forms approved by GHFA from time to time (including when you register to play football, register for a coaching or other courses);
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- (c) when you contact GHFA;
- (d) when you engage with GHFA via social media;
- (e) when you subscribe to receive GHFA related newsletters or other information;
- (f) when you enter a competition conducted by, or on behalf of, GHFA; or
- (g) when you lodge a claim or complaint with GHFA.

3.3 GHFA may also collect personal information about you from third parties, including:

- (a) third party vendors, when you purchase GHFA related merchandise or other merchandise ;
- (b) GHFA corporate partners, licensees, sponsors, and suppliers (***GHFA Partners***);
- (c) your representatives or agents;
- (d) FFA (including from FFA's MyFootballClub Customer Relationship Management System (***MyFootballClub***)), or another FFA Member Federation, or a branch, association, club, affiliate member, referees' body and/or a competition administrator registered with FFA or with FNSW from time to time (***Football Administrators***); and
- (e) the organisations identified under section 5 (Disclosing Your Personal Information) below.

#### 4. Using Your Personal Information

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4.1 GHFA may use the personal information collected about you in a variety of ways, including:

- (a) to verify your identity;
- (b) to ensure compliance with the FFA & FNSW Statutes and GHFA's Constitution, by laws, rules, regulations, policies, procedures and other governing documents, including the administration and development of football;
- (c) to organise, conduct and promote football competitions, matches, tournaments, programs and other events (including for the purpose of distributing newsletters, providing information and making ticket offers) and to meet any other objectives stated in GHFA's Constitution;
- (d) to process the registration of individuals to participate in football competitions, tournaments, matches, programs and other events, as a player, official or otherwise;
- (e) to develop programs, activities, events, products, services and merchandise relating to football and GHFA;

- (f) to provide you with information about our products and services, including information about tickets, merchandise and special offers which we reasonably believe may be of interest to you, some of which may be provided by, or in conjunction with, FNSW, FFA, government agencies, GHFA Partners or Football Administrators (both commercial and not-for-profit);
- (g) to investigate and take action in connection with any disciplinary, dispute or grievance processes mandated under FFA & FNSW Statutes or GHFA's Constitution, by laws, rules, regulations, policies, procedures or other governing documents;
- (h) to satisfy our obligations and to comply with applicable statutes, regulations and policies as a Member Association of the state governing body, FNSW, and, ultimately, the national governing body, FFA and regional governing body, the Asian Football Confederation (**AFC**) and the international governing body, Federation Internationale de Football Association (**FIFA**);
- (i) to satisfy our obligations under the *Corporations Act 2001* (Cth) and otherwise at law;
- (j) to carry out market research and surveys;
- (k) to maintain participation and service/benefit records, data and statistics, including for archive and historical purposes;
- (l) to contact you if you win a prize in a competition you have entered and to send the prize to you; and
- (m) any use that is reasonably apparent at the time the information is collected.

4.2 GHFA may also use the personal information collected about you:

- (a) to administer, manage and improve the GHFA Sites and to provide you with access to those GHFA Sites;
- (b) to ensure that content from the GHFA Sites is presented in the most effective manner for you and for your computer;
- (c) to allow you to participate in interactive features of a GHFA Site, when you choose to do so;
- (d) for direct marketing communications from GHFA in relation to products, services, tickets, merchandise and special offers made available by GHFA or GHFA Partners. You will be able to opt-out of direct marketing at any time, if you so choose, by utilising the unsubscribe feature on electronic marketing communications, or in the case of other direct marketing materials by contacting the GHFA Privacy Officer, in accordance with section 10 below;

- (e) where permitted by GHFA, to enable GHFA Partners, who have a relationship with GHFA, to market and promote their products and services to you. You will be able to opt-out of direct marketing at any time if you so choose, by utilising the unsubscribe feature on electronic marketing communications, or in the case of other direct marketing materials by contacting the GHFA Privacy Officer in accordance with section 10 below; and
- (f) any use that is reasonably apparent at the time the information is collected.

## **5. Disclosing Your Personal Information**

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- 5.1 GHFA may also share your personal information with third parties in relation to the operation of GHFA's business including:
- (a) GHFA's related bodies corporate;
  - (b) Football Administrators and any body established by FNSW or FFA to deal with disciplinary, dispute or grievance proceedings;
  - (c) FIFA and its members, including the AFC;
  - (d) the Australian Sports Anti-Doping Authority, and Court of Arbitration for Sport;
  - (e) third party service providers, such as ticketing agents, venue operators, event organisers, IT providers and social media websites;
  - (f) health providers or professionals;
  - (g) GHFA insurers;
  - (h) GHFA professional advisors, including our accountants, auditors and lawyers;
  - (i) as required or authorised by law or where we have a public duty to do so, including for purposes of safety and security;
  - (j) where you have consented to your personal information being disclosed to others;
  - (k) NSW Office of the Children's Guardian;
  - (l) NSW Department of Sport and Recreation; and
  - (m) NSW Department of Family and Community Services.

- 5.2 If you receive a product or service from, or your information is otherwise collected by, a third party, such as a GHFA Partner or Football Administrator, the relevant third party may have a separate privacy policy which applies to their collection, use and disclosure of your personal information. You should refer to that privacy policy for further details about how the relevant third party may collect, process, use, store and disclose your information and how you can contact the relevant third party if you have any queries, or wish to make a complaint, about their handling of your personal information.

## **6. GHFA Sites, Cookies and Other Technologies**

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- 6.1 If you visit a GHFA Site, GHFA may record information such as your Internet Protocol (IP) address, browser type, Internet Service Provider (ISP), referring/exit pages, operating system, the GHFA Site pages accessed and any information downloaded. This information is used for statistical, reporting and website administration and maintenance purposes, including identifying usage trends, to track users' movements around the GHFA Sites and to gather demographic information about GHFA users collectively.
- 6.2 Like many other websites, the GHFA Sites may use 'cookies' from time to time. A cookie is a piece of information that allows us to identify and interact more effectively with your device. The cookie helps GHFA to maintain the continuity of your browsing session and remember your details and preferences when you return. You can configure your web browser software to reject cookies however some parts of the GHFA Sites may not have full functionality in that case.
- 6.3 In some cases GHFA and its third party service providers may use cookies and other technologies such as web beacons and JavaScript on a GHFA Site in connection with online services like banner advertising, website analytics and surveys to collect information about your use of a GHFA Site. The use of these technologies allows GHFA and its third party service providers to evaluate a user's use of a GHFA Site, deliver customised advertising content, measure the effectiveness of the advertising and provide other services relating to website activity and internet usage. The services we may use from time to time include Google Analytics and Facebook. You can find more details in the privacy policies for those services, including information on how to opt-out of certain conduct.
- 6.4 When we send you emails or other electronic messages, GHFA may record where you open the message and click on particular links. This helps us to better understand what information is of interest to you.

## **7. Protecting Your Personal Information**

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- 7.1 GHFA takes the security of personal information seriously. GHFA has appointed a Privacy Officer to oversee GHFA's management of personal information in accordance with this Policy and the *Privacy Act 1988* (Cth).
- 7.2 GHFA takes reasonable steps to protect the security and privacy of your personal information. GHFA has directed its staff that personal information must be dealt with in accordance with this Policy and kept secure from unauthorised access or disclosure.
- 7.3 If you are considering sending us any other personal information through a GHFA Site or other electronic means, please be aware that the information may be insecure in transit, particularly where no encryption is used (e.g. email, standard HTTP). Any transmission is therefore at your own risk. Once GHFA has received your personal information, GHFA will take reasonable steps to protect all personal information within its direct control from unauthorised access.
- 7.4 Where GHFA has given you (or where you have chosen) a password which enables you to access certain parts of a GHFA Site, you are responsible for keeping this password confidential. GHFA suggests that you do not share the password with anyone and to change it regularly.

## **8. Disclosing Your Personal Information Abroad**

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- 8.1 GHFA will store personal information on data servers that are controlled by GHFA and are located within the geographical borders of Australia where reasonably possible. However, in some circumstances the personal information that GHFA collects may be disclosed to certain recipients, and stored at certain destinations, located outside Australia from time to time. For example, your personal information may be transferred outside of Australia if any of GHFA's servers from time to time are located outside Australia, or if one of GHFA's service providers or suppliers is located in a country outside Australia, or for disciplinary purposes, or in relation to international transfer certificates, passports, training compensation, mediation, arbitration or similar matters. As at the date of this Policy, GHFA utilises service providers and suppliers in the Czech Republic (iCompMan) and USA (JotForm). GHFA may also disclose your personal information outside of Australia in accordance with section 5 (Disclosing Your Personal Information), including to facilitate the registration of a player by a foreign governing body.

8.2 In all cases, by providing your personal information to us or using our services, you consent to the disclosure of your personal information outside Australia as set out in this Policy, and acknowledge that GHFA is not required to ensure that overseas recipients handle your personal information in compliance with Australian privacy law. However, where practicable in the circumstances, GHFA will take reasonable steps to ensure that overseas recipients only use and disclose such personal information in a manner which is consistent with this Policy. You may have rights to enforce such parties' compliance with applicable data protection laws, but it is possible that you will not have recourse against those parties under the *Privacy Act 1988* (Cth) in relation to how those parties treat your personal information.

## **9. Access to and Correction of Your Personal Information**

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9.1 GHFA takes all reasonable precautions to ensure the personal information that GHFA collects, uses and discloses is accurate, complete and up-to-date. However, the accuracy of that information depends on the information you provide. GHFA recommends that you let us know if there are any errors in your personal information and keep us up-to-date with changes to your personal information such as your contact details.

9.2 You have the right to access the personal information we hold about you, and can request the correction of your personal data if it is inaccurate, incomplete or out of date. If you would like to do so, please contact the GHFA Privacy Officer to submit an enquiry to access or update the personal information GHFA holds about you.

## **10. Opting Out of Direct Marketing Communications**

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You can opt out of receiving further messages or communications from GHFA at any time by following the unsubscribe instructions in the message sent to you. If you wish to unsubscribe from communications that GHFA sends to you, you can also send an email to [ghfa@ghfa.com.au](mailto:ghfa@ghfa.com.au).

## **11. Changes To This Policy**

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We may modify, alter or otherwise update this Policy at any time by publishing the new version of the Policy on the GHFA Sites. We will indicate any changes by updating the date of this Policy. If you have any questions about this Policy, please contact the GHFA Privacy Officer using the details below.

## **12. Contacting the GHFA Privacy Officer and Making Complaints**

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12.1 You may contact the GHFA Privacy Officer by writing to [ghfa@ghfa.com.au](mailto:ghfa@ghfa.com.au) or the GHFA Privacy Officer, PO Box 223, Eastwood NSW 2122.

12.2 You may complain about our collection, use or disclosure of your personal information by contacting the GHFA Privacy Officer using the contact details above with your full name and contact details, together with a detailed description of the complaint. We will respond to your complaint within a reasonable period of time and inform you of the next steps we will take in dealing with your complaint. If we are unable to resolve your complaint, we will inform you of the steps available to you in those circumstances.