



**Privacy
Policy**

of

**Little Athletics Association
of Victoria Incorporated**

Registration Number: A0003260D

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LAVic & Affiliated Centre Privacy Policy

1. Protecting Privacy

Stakeholder privacy is important to Little Athletics Victoria (LAVic), and its 101 Affiliated Centres. This policy provides information about the personal information that LAVic collects and the ways in which it may use, hold and disclose this personal information.

LAVic has 'opted-in' to adhere to the conditions outlined in the *Privacy Act 1988* (Cth). In doing so, LAVic agrees to protect individuals' privacy in accordance with the [Australian Privacy Principles](#) (the APPs).

Accordingly, LAVic undertakes to manage personal information in an open and transparent way. Further, it has taken steps to implement practices, procedures and systems relating to the its functions or activities that:

- will ensure that LAVic complies with the Australian Privacy Principles;
- will enable LAVic to deal with inquiries or complaints from individuals about its compliance with the Australian Privacy Principles;
- outlines the kinds of personal information that the LAVic collects and holds.
- outlines how LAVic collects and holds personal information;
- states the purposes for which LAVic collects, holds, uses and discloses personal information;
- clarifies how an individual may access personal information about the individual that is held by LAVic and seek the correction of such information;
- clarifies how an individual may complain about a breach of the Australian Privacy Principles and how LAVic will deal with such a complaint;
- states whether LAVic is likely to disclose personal information to overseas recipients.

2. LAVic Privacy Policy

This policy outlines the purposes and processes by which LAVic collects, holds and discloses personal information. Personal information is information that identifies or could identify individuals. LAVic may vary this policy from time to time, by posting an updated policy accessible via the LAVic website (www.lavic.com.au).

Protecting personal information is fundamental to LAVic's relationship with its stakeholders, in particular, Affiliated Centres, Competitive Members, Associate Members, Honorary Members, coaches, officials, volunteers, Directors of LAVic and employees. All personal information received in connection with an LAVic product or service, or in the conduct of LAVic's or Affiliated Centres' business, is therefore treated seriously, having regard to their legal obligations.

3. Use & Disclosure of Personal Information

LAVic collects, holds, uses and discloses personal information for purposes including:

- verifying Member identity;
- improving the LAVic website;

- providing, and assisting Regions, Affiliated Centres and Clubs to provide products and services to Members, managing and accounting for the products and services, and improving the products and services;
- managing LAVic's relationship(s) with Members;
- providing Members with information about events, products and/or services that may interest them;
- facilitating the internal business operations of LAVic, Regions, Affiliated Centres and Clubs;
- promoting and marketing LAVic events, products or services;
- enabling corporate partners and sponsors of LAVic, including Affiliated Centres, market and promote their products and services to Members; and

LAVic and Affiliated Centres may also disclose personal information where it is otherwise permitted to do so by law.

Personal information would not ordinarily be shared between Affiliated Centres.

Members consent to LAVic and Affiliated Centres using their personal Information for sending them information, including promotional material, about Little Athletics related products and services, as well as the products and services of third parties, now and in the future. Members also consent to LAVic sending them such information by means of direct mail, email and text messages.

Members may elect to opt out of receiving marketing information from LAVic by notifying the LAVic office in writing via email at office@lavic.com.au.

LAVic does not willingly disclose personal information to overseas recipients.

4. Anonymity and pseudonymity

Individuals have the option of not identifying themselves, or of using a pseudonym, when dealing with LAVic or an Affiliated Centre in relation to a particular matter.

5. Collection of information

LAVic and Affiliated Centres will not collect personal information unless the information is reasonably necessary for one or more of the functions or activities related to Little Athletics.

6. Means of collection

LAVic will collect personal information only by lawful and fair means.

LAVic may collect personal information directly from users of the LAVic website and any registration activity undertaken online, for example member registration, or event registration. The personal information which LAVic collects and holds includes:

- Member names, addresses, email addresses, gender, date of birth, contact information and the Affiliated LAVic Centre;
- Membership history, and subscriptions for LAVic services (custom information relevant to the Association and Centre in order to fulfil registration requirements);
- Member IP address and geolocation;

- Information derived from the use of "cookies";
- Details of the items ordered or purchased from LAVic;
- Event entries and history;
- Credit card details;
- Tax file numbers;
- Bank account details; and
- Working With Children Check details.

7. Dealing with unsolicited personal information

If LAVic receives personal information that was not solicited, it will determine whether it could have collected the information under the terms set out in section 4 'Collection of Information'. If it's determined that it should not have collected the personal information, it will commit to destroying the information or ensuring that the information is de-identified.

8. Notification of the collection of personal information

LAVic will take immediate steps to notify an individual when personal information has been collected and that individual is not aware of such. This will entail disclosing the identity and contact details of LAVic (and/or the Affiliated Centre), the fact that information has been collected, the circumstances of that collection, the purposes of the collection, the consequences, other parties to whom the information may be disclosed, the individual's rights to access personal information and have it corrected under the LAVic Privacy Policy, and the complaints provisions under the LAVic Privacy.

9. Use or disclosure of personal information

LAVic will not use or disclose information collected for purposes other than originally intended unless the individual has consented to the use or disclosure of the information.

LAVic will not use or disclose personal information to third parties for the purposes of assisting or facilitating their direct marketing activities.

10. Quality of personal information

LAVic will take such steps to ensure that the personal information that it collects, uses and discloses is accurate, up-to-date, complete and relevant.

11. Security of personal information

LAVic will take such steps to protect its information from misuse, interference and loss, and from unauthorised access, modification or disclosure.

If LAVic holds personal information about an individual that is no longer required, it will destroy the information or ensure that it is de-identified.

12. Access to personal information

12.1 Access

LAVic will, upon request by the individual, give an individual access to the information. LAVic will respond to requests for access to the personal information within 30 days after the request is made and give access to the information in the manner requested by the individual, if it is reasonable and practicable to do so.

12.2 Refusal of a request

If LAVic considers there to be reasonable grounds to refuse a request for access to the personal information, it will give the individual a written notice that sets out the reasons for the refusal and the mechanisms available to complain about the refusal.

12.3 Corrections

If LAVic holds personal information about an individual and either LAVic is satisfied that the information is inaccurate, out of date, incomplete, irrelevant, misleading or the individual requests LAVic to correct the information, then LAVic will move to correct that information to ensure that the information is accurate, up to date, complete, relevant and not misleading.

12.4 Notification of correction to third parties

If LAVic corrects personal information about an individual that it previously disclosed to another entity and the individual requests LAVic to notify the other entity of the correction, LAVic will proceed to give that notification.

12.5 Making a request to LAVic

An individual may:

- request access to, and seek the correction of their personal information held by LAVic at any time;
- make a complaint in relation to a breach of privacy; or
- submit a query or concern about this privacy policy or LAVic information handling processes,

by contacting LAVic at office@lavic.com.au or the relevant Affiliated Centre by email. (See the list of Centre email addresses below). LAVic aims to respond to valid requests by within 30 days.

Members will be required to provide proof of identity in order to obtain access to their personal information. LAVic may charge a fee where access is provided. LAVic may refuse to provide access if permitted to do so by law.

13. Accessing LAVic Online

The LAVic website refers to the top-level domain located at <http://www.lavic.com.au/>, all related sub-domains and any other LAVic website (including any Affiliated Centre website) which provides a Little Athletics product and/or service. The LAVic internet server may automatically record details about any computer used to access the website (such as the IP address, domain name and browser type), the date and time of access, and details of the information downloaded. This information may be used for internal statistical, reporting and continual improvement purposes.

The hosting of the LAVic and some Affiliated Centre websites is provided under contract by SportsTG Pty Ltd.

14. Cookies

LAVic and Affiliated Centres may use "cookies" on their websites. A cookie is a widely used text file that a website may place on a user's device for the purposes of recording user

preferences and improving the user experience. Cookies may collect and store personal information of users.

A web browser can be configured to accept all cookies, reject all cookies, or notify the user when a cookie is sent.

15. Website Analytics

LAVic's website host, SportsTG may collect user information for statistical, reporting and maintenance purposes.

Subject to the terms of this privacy policy, this information is used to administer and improve the performance of the LAVic website and will not be used to identify users. The information may include:

- the number of users visiting the website and the number of pages viewed;
- the date, time and duration of a visit;
- visiting patterns of individuals accessing the LAVic website;
- the IP address of the user's computer; and
- the path taken through the website.

LAVic may use website analytic services to help analyse user behaviours on the LAVic website. Website analytics generate statistical and other information about website use by means including but not limited to cookies which are stored on users' computers. The information generated is used to create reports about the use of the LAVic website. Third party providers of these services may store this information. LAVic will not (and will not allow any third party to) use website analytics to track or to collect any personally identifiable information of visitors to the LAVic website. LAVic will not associate any data gathered from the LAVic website with any personally identifying information from any source as part of LAVic's use of website analytics.

LAVic treats personal information that may be obtained through cookies and any other information supplied to them (for example, an email) in accordance with this privacy policy.

16. Social Media

LAVic operates social media accounts on the following platforms for the purposes of engaging and informing its stakeholders, and the community at large:

- Facebook: @LittleAthsVictoria
- Twitter: @LittleAthsVic
- YouTube: LAVicTV
- Instagram: littleathsvic
- LinkedIn: Little Athletics Victoria
- Team App: Little Athletics Victoria

LAVic encourages its stakeholders and community members to follow its social media accounts and engage directly with LAVic via social media channels if and when desired. LAVic may communicate directly to its social media followers from time to time. LAVic may also enlist the services of online analytical services to monitor social media engagement patterns of user behaviour.

17. Storage of Personal Information

Wherever reasonably practicable, LAVic will store personal information on data servers that are owned and controlled by LAVic and are located within the geographical borders of Australia. However, some personal information may be transferred, stored, processed, used or disclosed overseas by third party service providers.

18. Information Security

LAVic will take reasonable steps to protect all personal information within their direct control from misuse, interference, loss, unauthorised access, modification or disclosure. Further, it will take reasonable steps to hold information securely in electronic or physical form in access controlled premises or in electronic databases requiring logins and passwords.

19. Notifiable Data Breaches

LAVic is obligated to notify affected individuals and the Australian Information Commissioner about data breaches that are likely to result in serious harm (defined as psychological, physical, reputational or other).

An eligible data breach occurs when:

- a. there is unauthorised access to, or unauthorised disclosure of personal information, or a loss of personal information that LAVic or an Affiliated Centre holds;
- b. This is likely to result in serious harm to one or more individuals;
- c. LAVic has not been able to prevent the likely risk of serious harm with remedial action.

20. Complaints

At all times, privacy complaints:

- will be treated seriously;
- will be dealt with promptly;
- will be dealt with in a confidential manner; and
- will not affect complainants existing obligations or affect the commercial arrangements between them and LAVic.

Complaints should include:

- contact details and any relevant reference numbers or identifiers;
- the name of the Association, Region, Centre (or other organisation) involved;
- a brief description of the privacy problem;
- any action the organisations have taken to fix the problem;
- what is being sought to resolve the complaint;
- copies of any relevant documents.

Complaints are to be made in writing and submitted to the LAVic office via email to office@lavic.com.au.

LAVic's Chief Executive Officer will investigate valid complaints and respond within 30 days. Complainants will be informed of the outcome within a reasonable period of time following completion of the investigation.

If a complaint is not responded to within 30 days, or the complainant is dissatisfied with the response, the complaint can be escalated to the Office of the Australian Information Commissioner (OAIC). The complaint to the OAIC must be completed on the Privacy Complaint Form (online, or in soft copy and emailed to enquiries@oaic.gov.au).