



# AGILITY DOG ASSOCIATION OF AUSTRALIA LTD

ABN 83 070 415 404

## PRIVACY POLICY

### **Introduction:**

Your privacy is important. The Board of the Agility Dog Association of Australia Ltd (ADAA) is committed to protecting the quality and privacy of personal information with the Association collects, holds and administers. Personal information is information which directly or indirectly identifies a person.

### **Purpose:**

The purpose of this Policy is to outline the Association's policy on how ADAA uses and manages personal information provided to or collected by it. ADAA may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to ADAA operations and practices and to make sure it remains appropriate to the changing not-for-profit sport environment.

### **Policy Statement:**

ADAA collects and administers a range of personal information for the purposes of enabling the Association to promote the sport of "Agility". The Association is committed to protecting the privacy of personal information it collects, holds and administers.

ADAA recognises the essential right of individuals to have their information administered in ways which they would reasonably expect – protected on one hand, and made accessible to them on the other. These privacy values are reflected in and supported by our core values and philosophies.

The type of information the Association collects and holds includes (but is not limited to) personal information (which includes photographs), including sensitive information about:

- Members (including parents and/or guardians) before, during and after the period of membership
- Job applicants, employees, volunteers and contractors; and
- Other people who come into contact with the Association.

In broad terms this means that we:

- Collect only information which the Association requires for its primary function;
- Ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered;
- Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent;
- Store personal information securely, protecting it from unauthorised access; and
- Provide stakeholders with access to their own information, and the right to seek its correction.

The purposes for which ADAA uses personal information of members and others include:

- to keep members informed about matters related to the Association, through correspondence, newsletters, magazines and the Association website;
- day-to-day administration;
- seeking donations and marketing for the Association; and/or
- to satisfy ADAA's legal obligations and allow the Association to discharge its duty of care.

In some cases where ADAA requests personal information about a member, if the information requested is not obtained, the Association may not be able to register or continue the registration of the (prospective) member.

In relation to personal information of job applicants, staff members and contractors, the Association's primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be. The purposes for which the Association uses personal information of job applicants, staff members and contractors include:

- in administrating the individual's employment or contract, as the case may be;
- for insurance purposes;
- seeking funds and marketing for the Association;
- to satisfy ADAA's legal obligations, for example, in relation to child protection legislation.

The Association also obtains personal information about volunteers who assist the Association in its functions or conduct associated activities, to enable ADAA and the volunteers to work together.

The Association treats marketing and seeking donations for the future growth and development of the Association as an important part of ensuring that the Association continues to provide a quality environment. Personal information held by the Association will not be disclosed however market segment information may be provided to sponsors and the like.

### **Definitions:**

Club – affiliated club or group who is in good standing with ADAA and is financial.

Member – person who is recognised within one of the categories of membership.

### **Responsibilities:**

ADAA's Board of Directors is responsible for adopting this policy.

ADAA's Board of Directors, all staff members, contractors and volunteers are responsible for the implementation of this policy.

ADAA's Secretary is responsible for monitoring changes in Privacy legislation and for reviewing this policy as and when the need arises.

### **Procedure:**

#### **1. Collection**

##### 1.1. ADAA will:

- 1.1.1. Generally collect personal information held about an individual by way of forms filled out by the person (or their guardian), face-to-face meetings and interviews, telephone calls, information transmitted electronically and from information submitted by Clubs and ADAA's Judges.
- 1.1.2. Only collect information that is necessary for the performance and primary function of ADAA.
- 1.1.3. Notify stakeholders about why we collect the information and how it is administered.
- 1.1.4. Notify stakeholders that this information is accessible to them.

#### **2. Use and Disclosure**

##### 2.1. ADAA will:

- 2.1.1. Only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose.
  - 2.1.2. For other uses we will obtain consent from the affected person.
- 2.2. The information we collect is essential for us to be able to identify accurately who is requesting our newsletter service so that we may be able to respond to individuals' requests.

- 3. Sensitive Information**
  - 3.1. ADAA will not collect personal information which reveals race, religious beliefs, political opinions, trade union membership, details of health, disability or sexual activity or orientation unless the individual has consented.
  - 3.2. In referring to 'sensitive information', ADAA means information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences or criminal record, that is also personal information, together with health information about an individual.
  - 3.3. Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless it is agreed otherwise, or the use or disclosure of the sensitive information is allowed by law.
  
- 4. Data Quality**
  - 4.1. ADAA will:
    - 4.1.1. Take reasonable steps to ensure the information we collect, use and disclose is accurate, complete, up-to-date, and relevant to the purposes for which it is to be utilised.
  
- 5. Data Security and Retention**
  - 5.1. ADAA will:
    - 5.1.1. Safeguard the information we collect and store against misuse, loss, unauthorised access and modification.
    - 5.1.2. All information that ADAA no longer requires will be destroyed or permanently de-identified to ensure continued protection of personally identifiable information.
  
- 6. Openness**
  - 6.1. ADAA will:
    - 6.1.1. Ensure stakeholders are aware of ADAA's Privacy Policy and its purposes.
    - 6.1.2. Make this information freely available in relevant publications and on the Association's website.
  
- 7. Access and Correction**
  - 7.1. ADAA will:
    - 7.1.1. Ensure individuals have a right to seek access to information held about them and to correct it if it is inaccurate, incomplete, misleading or not up-to-date. However, there will be occasions when access is denied. Such occasions would include where release of the information would have an unreasonable impact on the privacy of others, or where the release may result in a breach of ADAA's duty of care to the member.
    - 7.1.2. Take reasonable steps to correct information where an individual establishes that the information held about them by ADAA is not accurate, complete or up to date.
  
- 8. Anonymity**
  - 8.1. ADAA will give stakeholders the option of not identifying themselves when completing evaluation forms or opinion surveys.
  - 8.2. Whenever it is lawful and practicable, individuals will have the option of not identifying themselves when entering into transactions with ADAA.
  
- 9. Making information available to other service providers**
  - 9.1. ADAA:
    - 9.1.1. Will release personal information about a person and/or their dog to affiliated Clubs in order to facilitate the holding of sanctioned Competitions
    - 9.1.2. Will release personal information about a person and/or their dog to service providers in order to facilitate the holding of sanctioned Competitions and/or ADAA's operations, subject to a statement of confidentiality from the service provider that they will not release that information to any other parties.
    - 9.1.3. Will release information to third parties where it is requested by the person concerned.

- 9.1.4. May hold and/or transfer personal data outside of Australia for the following purposes:
- 9.1.4.1. internet and/or database services
  - 9.1.4.2. where the transfer is necessary for the performance of a contract between the individual concerned and ADAA
  - 9.1.4.3. if the individual concerned requests the transfer; or
  - 9.1.4.4. if the transfer is for the benefit of the individual concerned and it is not practicable to obtain the individual's consent as to the subject matter of the information transferred.

**Stakeholders to be consulted prior to policy change:**

Board of Directors

**Related documents:**

Memorandum and Articles of Association

Social Media Policy POL-PPL-031

<b>Date</b>	<b>Action (Created/Reviewed)</b>	<b>Created/Reviewed by</b>	<b>Next review due</b>
27 January 2013	Created	Chairman	
3 February 2013	Approved	Board of Directors	
17 October 2015	Revised	Board of Directors	