



PRIVACY POLICY – EXTERNAL

1. INTENT

Sydney University Sport and Fitness Limited (**SUSF, We, Our or Us**) (ABN: 45 634 542 644) is a sport and fitness organisation comprising of sport and recreation clubs, top-level sporting and fitness facilities, sport and recreation programs and as the offering of scholarships as part of the SUSF Elite Athlete Program.

SUSF and its related entities consider the privacy and protection of your Personal Information as important, and are committed to handling your Personal Information in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**) and other applicable laws which set out clear standards for the collection, access, storage, use and disclosure of your Personal Information.

This Privacy Policy sets out what Personal Information We collect, the way in which We collect, use, disclose and secure that Personal Information, the way in which you can access and correct your Personal Information, and what complaint procedures are available to you if you feel We have breached Our obligations under relevant legislation.

We may amend or update Our Privacy Policy at any time and will publish the amended policy on the SUSF website. We encourage you to check the SUSF website regularly to ensure that you are aware of the current terms of Our Privacy Policy.

By visiting SUSF or submitting any Personal Information to Us (whether to a club, facility, via Our website or otherwise), you are accepting and consenting to the practices described in this Privacy Policy.

2. SCOPE

This Privacy Policy applies to Personal Information collected, used and disclosed by SUSF about SUSF members, consumers, scholarship applicants or holders, users of Our services and facilities (including participants in the SUSF School Holiday Programs and participants in the SUSF Swim School), contractors, suppliers, job applicants (whether for job vacancies, potential employment, work experience/internships or honorary engagements), tenants, hirers of SUSF facilities, donors and volunteers (including Honorary Coaches).

This Policy does not apply to the collection, use and disclosure of employee records of our current and former employees, which are exempt from the Privacy Act and are covered by a separate policy. If you are an employee, please refer to the SUSF Privacy Policy for Employees and Volunteers.

COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

What Personal Information is collected and held?

Personal Information that SUSF collects and hold could include but is not limited to:

- Name, contact details, gender, date of birth, banking and credit card details and emergency contact information.
- Membership number (where relevant) and usage of the SUSF facilities.
- A photograph for SUSF membership cards.
- We may use CCTV in Our facilities for health and security reasons.



- Comments, preferences and opinions, including for the purpose of surveys and goods and services that We offer from time to time.
- Personal Information that you provide when using Our online portals, including any profile that you create while using Our services including health, training, education and nutritional information.
- For users of Our services and facilities: We also collect Health Information in order to assess your readiness for physical activity/exercise, ability to participate in programs, athletic performance or general welfare and to provide medical treatments as required.
- For scholarship applicants and holders: We also collect details of your academic qualifications and history, degree details, sporting performance and rankings, enrolment and academic performance (including academic results and transcript) and study and sports timetable.
- For participants in the School Holiday Programs: We also collect the child's school, whether the child's parent or guardian is a staff member of the University of Sydney, photographs of the child at the Program for publicity and advertising purposes and Health Information about the child (including any medical, behavioural or additional needs and allergies).
- For volunteers: We also collect your Working With Children details, qualifications, income, income producing activities and coaching activities.
- For job applicants: We also collect Personal Information concerning your qualifications, experience and references, criminal record and background checks, along with information about your education, employment history, resume, contact details, references and Working With Children details. We may also collect certain of your Health Information if it is relevant to the job that you are applying for.

How will We collect and hold your Personal Information?

We may collect Personal Information directly from you when you:

- Communicate with Us directly, including in person or via email, telephone Our websites or online portals.
- Apply for or participate in a scholarship as part of the SUSF Elite Athlete Program.
- Become a registered member of SUSF.
- Use Our facilities on a casual basis.
- Register for and participate in the SUSF School Holiday Programs.
- Make a donation to SUSF.
- Enter into a consumer promotion or competition that We run.
- For scholarship applicants and holders: SUSF may also collect academic results and transcripts from the University of Sydney. SUSF or a third party acting on behalf of SUSF may also retain a health professional to provide a report to SUSF to determine whether you are ready, able and eligible to participate in the Elite Athlete Program.
- For business customers, contractors and guarantors: We may also collect Personal Information from a third-party credit reporting body if We request a credit report about you. Please see Our Credit Information Policy available on request for further details about Our handling of credit-related Personal Information.
- For job applicants: We may also collect Personal Information when you provide Us with a resume or application, or provide Us with Personal Information (including Health Information) during the recruitment process. We may also collect Personal Information from third parties. For example, this may happen when We conduct reference and background checks, when you apply for a position through a third party recruitment agency (e.g. Seek, Sportspeople); when you have authorised third parties to deal with Us on your behalf (e.g. LinkedIn) or when We retain third party providers (such as health professionals) to conduct reference checks, criminal record checks or pre-employment health/fitness-for-work assessment in relation to you.



- For users of Our services who are under 18 years of age: We collect Personal Information directly from such users including their membership number, CCTV footage and their usage of clubs and facilities. Otherwise, We do not knowingly collect Personal Information from individuals under 18 years of age without the permission of their parent or guardian. As a parent or guardian, please do not allow your children to submit their Personal Information without your prior permission.

Regardless of how it is collected, We will use, hold and disclose your Personal Information in accordance with this Policy.

What are the purposes for Us collecting and using your Personal Information?

We may collect Personal Information about you for the following purposes and uses:

- To provide you with services, operate Our facilities and clubs, run Our business and operations and fulfil Our obligations, including under the Membership Agreement.
- To communicate and manage Our relationships with you.
- To contact you about Our brands, products, services, special offers, promotions, newsletters, online surveys, fundraising campaigns, alumni events, news and competitions.
- To maintain and update Our records.
- To carry out market data analysis so that We can continue to deliver enhanced services and facilities.
- To improve Our platform, prevent or detect fraud or abuses, enable third parties to carry out technical, logistical or other functions on Our behalf and maintain and develop Our business systems, including testing and upgrading them.
- We use Health Information, allergies, injuries and disabilities of those who use Our services to assess your readiness for physical activity/exercise, ability to participate in programs, athletic performance or general welfare and to provide them with medical treatments as required.
- For scholarship applicants and holders: We also use your Health Information and academic and sporting performance and history to ensure that you are ready, able and eligible to participate in the Elite Athlete Program.
- For participants in the School Holiday Programs: We may also use photographs of children at the Program may be used for publicity and advertising purposes.
- For job applicants: We may also use your Personal Information to assess your suitability for employment with SUSF, and manage the recruitment and placement processes. For example, We may use it to assess your skills, qualifications and interests against Our career opportunities or the vacancy you have applied for, conduct reference checks and verify your information and conduct criminal record and background checks to determine whether you are suitable for employment at SUSF. We may use your Health Information in relation to a pre-employment health/fitness assessment to determine your fitness for work and for other purposes directly related to your application or employment (if you are successful).

Who will We disclose your Personal Information to?

SUSF may disclose your Personal Information to:

- Related entities and affiliates of SUSF (including clubs).
- The University of Sydney and its affiliates and related entities.
- IT system administrators who assist Us; including those who maintain Our IT systems and websites and store Our data.
- Medical and health providers who provide services to SUSF members or users of SUSF's services or facilities.



- Investigators, police and law enforcement authorities in connection with actual or potential misconduct, unlawful activity and acquisitions of Our business or licences.
- Third party service providers that assist Us with services such as archival, auditing, accounting, customer contact, legal, business consulting, banking, payment, debt collection, delivery, data processing, data analysis, information broking, research, investigation, insurance, website or technology services.
- Credit reference agencies or debt collection agencies – for example if you default on payments due or to obtain payment from you.
- For scholarship applicants and holders: We may also provide your Personal Information and Health Information to sports psychologists or other healthcare providers.
- For volunteers, contractors and suppliers: We may also provide your Personal Information to the Australian Taxation Office, superannuation fund trustees and administrators.
- For job applicants: We may also provide your Personal Information to referees identified by you in job applications to Us and third party providers of background screening services, medical assessments and other services relevant to the recruitment process, including for reference, criminal record and background checks, or pre-employment health/fitness-for-work assessments.

STORAGE AND SECURITY

We take reasonable steps to ensure that your Personal Information is held securely. We have implemented appropriate physical, electronic and managerial security procedures in order to protect Personal Information from unauthorised access, loss, misuse, alteration or destruction.

We store your Personal Information in hardcopy or electronic form, and We protect your Personal Information through physical security (including locks and security systems at Our office premises) and computer and network security (including use of firewalls, identification codes, access controls and passwords). We also store some Personal Information with third-party data storage providers, who also employ a range of security measures to protect such information.

In the case of job applicants, if you are unsuccessful in obtaining the position, We may retain your application and Personal Information for a reasonable period in order to contact you if a suitable position becomes available with Us.

ARE WE LIKELY TO DISCLOSE YOUR PERSONAL INFORMATION TO OVERSEAS RECIPIENTS?

No, We are not likely to disclose any of your Personal Information to overseas recipients.

COOKIES & WEBSITE ANALYTICS

We may use “cookies” on Our website. A cookie is a small text file that We may place on your computer if you use Our website. Usually, cookies are used as a means for Our websites to remember your preferences and are thus designed to improve your experience of SUSF. Cookies may collect and store Personal Information about you.

You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. Each browser is different, so check the “Help” menu of your browser to learn how to change your cookie preferences.



If you disable the use of cookies on your web browser or remove or reject specific cookies from Our website or linked sites, then you may not be able to gain access to all of the content and facilities on SUSF online facilities. When you visit and browse Our website, the website host and some third party service providers may collect 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 SUSF website and will not be used to identify you. The information may include:

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

We use website analytic services to help analyse how you use SUSF (website analytics). 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 SUSF website.

LINKS TO OTHER WEBSITES

Our site may include links to other websites. These third-party websites may use technology to send (or "serve") the advertisements that appear on Our website directly to your browser. They automatically receive your IP address when this happens. They may also use cookies, JavaScript, web beacons (also known as action tags or single-pixel gifs), and other technologies to measure the effectiveness of their ads and to personalise advertising content. We do not have access to or control over cookies or other features that these third parties may use, and the information practices of these advertisers and third-party websites are not covered by this Privacy Policy. Please contact them directly for more information about their privacy practices.

WHAT CHOICES DO YOU HAVE?

You may choose not to provide Personal Information to SUSF at any time. However, this may mean We cannot provide some or all of Our services to you or continue Our relationship with you. If you do not want to receive email or other mail from Us, please 'unsubscribe' or notify Us in writing that you don't wish to receive these offers. However, please note, if you do not want to receive legal notices from Us, such as this Privacy Policy, those notices will still govern your use and membership of SUSF and it is your responsibility to review them for changes.

You have the right to ask Us not to use your Personal Information for marketing purposes by sending an email to the SUSF Privacy Officer, whose details are set out below.

HOW CAN YOU ACCESS YOUR PERSONAL INFORMATION AND CORRECT IT?

We take reasonable steps to ensure your Personal Information is accurate, complete and up to date. You generally have a right to request access your Personal Information and to request its correction from Us. There are certain exceptions to this which apply under legislation, including, for example, where providing such access would have an unreasonable impact on the privacy of others.



You can request to access your Personal Information that We have on record about you, or request that We update or correct that Personal Information, by writing or emailing Us:

SUSF Legal Department
Legal Counsel
legal@sport.usyd.edu.au
University Sports & Aquatic Centre Building G09
University of Sydney NSW 2006

We will need to verify your identity before giving you access or correcting Personal Information. We will endeavour to respond to your request to access or update Personal Information as quickly as possible. We will provide you access to Personal Information in the manner that you request, if that is reasonable and practicable for Us to do so. If We are not able to provide that information in the way that you request, We will write to you and explain the reasons for this, and We will take reasonable steps to give you access to your Personal Information in an alternative manner that meets your needs and Ours. We will also inform you of what you can do if you are not satisfied with Our response.

We will not charge you an application charge for simply requesting access to your Personal Information. However, depending on the complexity of your request, We may charge you a fee for processing the request including costs of postage, and staff costs in searching, locating and retrieving the requested information. We will ensure that these costs are not excessive.

In certain instances, We may refuse to give you access to your Personal Information. In these circumstances, We will write to you to explain why We have refused access, and inform you of what you can do if you are not satisfied with Our response.

Where you request for Us to correct Personal Information We hold that you believe is inaccurate, incomplete, out-of-date, or misleading, We will endeavour to respond to your request as quickly as possible. You will not be charged for making that request, or for any work We conduct in correcting the information. We will take reasonable steps to correct that information once We are satisfied that that information is inaccurate, incomplete, out-of-date or misleading. If We refuse your request, We will write to you and explain why We have refused, and also tell you what you can do if you are not satisfied with Our response.

HOW CAN YOU MAKE A COMPLAINT AGAINST US FOR A BREACH OF YOUR PRIVACY, AND HOW WILL YOUR COMPLAINT WILL BE HANDLED?

You are entitled to complain if you believe that your privacy has been compromised or if We have breached the relevant legislation. If you have a complaint, you should write to:

Privacy Complaints
SUSF Legal Department, University Sports & Aquatic Centre
Building G09
The University of Sydney NSW 2006

We will endeavour to respond to you in writing as quickly as possible, informing you of Our decision in relation to your complaint. If you believe that your complaint has not been satisfactorily resolved, then you can access an external dispute resolution service or contact the Office of the Australian Information Commissioner (OAIC).



3. ABOUT THIS POLICY

Subject	Privacy Policy
Authorised by	Chief Executive Officer
Contact	Human Resources
Version	1.0
Commencement	01 November 2020
Next review	01 July 2022