



# CALISTHENICS VICTORIA

## PRIVACY POLICY

## Version Control, Change History and Distribution

### Version Control

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Prepared by:	CV Governance Committee
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### Change History

Amendment Date	Version No.	Page No(s) replaced	Description of change
26 September 2023	2.0		Removal of ACF References
21 November 2023	3.0		Amendment of Registered Adjudicator definition

Distribution: All membership via soft copy and downloadable from CV Website Policy Bank

## 1. INTRODUCTION

Calisthenics Victoria is committed to high standards of ethical conduct and accordingly places great importance on making clear organisational policies.

Calisthenics Victoria is committed to promoting and celebrating its values of: Confidence, Courage, Connection and Community.

Policies and procedures are essential in establishing the desired culture at Calisthenics Victoria and reflect Calisthenics Victoria's current strategic priorities. They reinforce the personal responsibility of all Participants to interact in a positive way and be committed to working to the standards articulated throughout this Policy.

Compliance with the policies and procedures will foster and maintain public trust and confidence in the integrity and professionalism of Calisthenics Victoria and Participants.

## 2. SCOPE

This Policy applies to all:

- Calisthenics Victoria Officers, Affiliated Organisations, Clubs, Affiliated Competitions, Members, Registered Adjudicators, Registered Coaches, Registered Performers, Chaperones, Life Members, Volunteers and all other persons bound by Calisthenics Victoria's Constitution, By-Laws and Policies (herein referred to as "**Participants**" throughout this Policy); and
- Calisthenics Victoria offices, competition venues, practice venues, performance venues, team travel locations, workshops, functions, events, transit locations (for example airports) and similar premises (herein referred to as "**Venues**" throughout this Policy).

This Policy applies to any situation which could be identified with or reflect on Calisthenics Victoria, Participants and Venues, including out-of-hours activities such as training, competitions, social functions, conferences or when wearing a Calisthenics Victoria uniform or identification badge.

This Policy does not replace, but supports, relevant legislation, regulation, and wider industry policies.

## 3. OBJECTIVE

Calisthenics Victoria has adopted the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth). The Australian Privacy Principles govern the way in which Calisthenics Victoria collects, uses, discloses, stores, secures and disposes of Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at [www.aoic.gov.au](http://www.aoic.gov.au)

This Privacy Policy (**Policy**) outlines Calisthenics Victoria's ongoing obligations to Participants and other people in respect of how Calisthenics Victoria manages Personal Information.

#### 4. DEFINITIONS AND INTERPRETATIONS

Reference term	Definition and Interpretation
Affiliated Organisations	Means the Australian Society of Calisthenic Adjudicators (Victorian Branch) Incorporated ( <b>ASCA</b> ) (and its successors), and Clubs.
Affiliated Competition	Means an organisation affiliated with Calisthenics Victoria for the purpose of running a competition
Calisthenics Victoria	Calisthenics Victoria is the recognised Victorian State Sporting Organisation for the Sport of Calisthenics.
Calisthenics Victoria Officers ( <b>Officers</b> )	Includes: <ul style="list-style-type: none"> <li>• The Chief Executive Officer and staff of Calisthenics Victoria, including casual employees, volunteers, contractors, and personnel involved with Calisthenics Victoria.</li> <li>• The Board, Committees, Delegates, Officials and anyone holding governance position (paid and volunteer).</li> <li>• Those employed by Calisthenics Victoria’s subsidiaries in any capacity.</li> <li>• Contractors, where relevant.</li> </ul>
Club	Means a group on individuals who have joined together to affiliate with Calisthenics Victoria for the purposes of instructing calisthenics to Registered Performers.
Competition	Reference to Competition includes time in transit, venue facilities and accommodation.
Ethics	The guiding values, principles and standards that enable people to determine how things should be done and how they should act. Ethics refers to the judgements that people make and the process that determines those judgements. It is the process by which people make value-based decisions which ultimately guides their actions and behaviours.
Member	Means an organisation, club or individual affiliated with Calisthenics Victoria
Participants	Includes Calisthenics Victoria Officers, Affiliated Organisations, Clubs, Members, Registered Adjudicators, Registered Coaches, Registered Performers, Chaperones, Life Members, Volunteers, Stakeholders and all other persons bound by Calisthenics Victoria’s Constitution, By-Laws and Policies
Policy	Privacy Policy
Registered Adjudicator	Means an adjudicator approved by Calisthenics Victoria.
Registered Coach	Means a member of the Victorian Calisthenics Coaches Association, a Division of Calisthenics Victoria.
Registered Performer	Means a person who is a member of an affiliated Club and is registered for the purposes of competitive or recreational calisthenics. Also known as athletes.

Reference term	Definition and Interpretation
Stakeholders	Calisthenics Victoria's Board, Clubs, Committees and Associations including their members and associations and Calisthenics Victoria staff
Venues	Calisthenics Victoria office, competition venues, practice venues, performance venues, team travel locations, workshops, functions, events, transit locations (for example airports) and similar premises.

## 5. POLICY PRINCIPLES AND APPLICATION

### 5.1 Policy Statement

Calisthenics Victoria will only collect personal information in a lawful and fair way. If practical, Calisthenics Victoria will collect the information from individuals personally and not via third parties. However, there are situations where Calisthenics Victoria is permitted to collect information from third parties. For example:

- When it would reasonably be expected or where an individual has consented to personal information being shared
- when a law enforcement agency requests personal information about an individual who is under investigation, the individual may not be asked directly because to do so may jeopardise the investigation

For more information, see the [Australian Privacy Principles \(APP\) Guidelines, Chapter 3](#).

### 5.2 What is Personal Information

The personal information Calisthenics Victoria collects depends on the interactions participants have with Calisthenics Victoria. Personal Information includes information about an individual that makes them reasonably identifiable. Participants may have the option of interacting with Calisthenics Victoria anonymously, however in some instances this may prevent Calisthenics Victoria from being able to provide products, services and related opportunities, for example placing an online order for products.

The personal information Calisthenics Victoria collects and uses depends on the Participant's interactions and transactions with Calisthenics Victoria, and may include:

- Name
- Date of birth
- Mailing or street address
- Email address
- Telephone number
- Location details through a smart phone or device
- Image
- Profession or occupation
- Demographic information
- Related calisthenic competition results, pupil skills and other related competition information
- Background checks including but not limited to police checks and working with children checks
- Any additional information relating to Participants that they have provided to Calisthenics Victoria directly, or indirectly through technical information e.g. browser, websites visited, IP address, user and system preferences, device type
- Transaction, product, services and activity details of purchases, preferences and interactions
- Information provided to Calisthenics Victoria directly, or indirectly through membership forms,

- competition forms and/or surveys
- Details of communications and interactions with Calisthenics Victoria

Calisthenics Victoria may also collect some information that is not personal information because it does not identify individuals. For example, Calisthenics Victoria may collect anonymous answers to surveys or aggregated information about participation in Calisthenics.

### 5.3 Collection of Personal Information

Personal Information is obtained in many ways, including:

- Online stores, social media platforms
- During conversations between individuals and representatives of Calisthenics Victoria
- Completion of a membership application
- Registration to attend competitions
- Subscriptions, e.g. newsletters and other Calisthenics Victoria communications
- In the event Calisthenics Victoria advertises volunteer or paid roles through online databases, for example, coaches and adjudicators
- From media and publications
- From other publicly available sources
- From cookies
- From third parties
- Purchasing or placing an order
- Setting up an account
- Transactions including through non-cash payments, or requests for a service such as pre-orders
- Attendance at a function or event
- Sending an enquiry or providing feedback
- Participating in or entering a promotion, competition, or survey
- Involvement in an incident
- A mailing list
- Reviews, ratings or comments on Calisthenics Victoria website or social media page, or other user generated content from Calisthenics Victoria's websites or Apps

Calisthenics Victoria will endeavour to collect personal information directly from individuals unless it is unreasonable or impracticable to do so.

Calisthenics Victoria does not guarantee website links or policy of authorised third parties.

### 5.4 Use of Personal Information

Calisthenics Victoria uses Personal Information primarily to provide, administer, improve and personalise products, services and related opportunities, and to support business functions, including:

- Provision of services and relevant information pertaining to membership and registration
- Assessment of the website and social media metrics to improve the operation of the website
- Conduct of business processing functions including providing personal information to Calisthenics Victoria Officers
- Administration and planning, product and service development, quality control and research
- Marketing (including direct marketing) purposes of Calisthenics Victoria and its partners
- Processing and responding appropriately to complaints
- Improvement of service operations to enhance customer experience

- Processing of transactions and payments, delivery of products and services and provision of refunds and discounts
- Maintenance and updating of online account information
- Verification of identity
- Promotion and marketing of Calisthenics Victoria products and services, events and competitions, public relations and social media
- Statistical analysis and research, general planning and administration, and as otherwise required or permitted by law
- Compliance with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country

Calisthenics Victoria may also use Personal Information for secondary purposes closely related to the primary purpose, in circumstances where such disclosure would reasonably be expected. Subscription to mailing and marketing lists is voluntary and individuals can unsubscribe at any time by contacting Calisthenics Victoria in writing.

Calisthenics Victoria may also collect, hold, use and disclose personal information for other purposes explained at the time of collection or which are required or authorised by or under law, and for which consent is provided.

Individuals using Calisthenics Victoria products, services and related opportunities agree and consent to the collection, use and disclosure of personal information in connection with the provision of Calisthenics Victoria's products, services and related opportunities.

## 5.5 Disclosure of Personal Information

Calisthenics Victoria works with a number of approved suppliers and partners that provide Calisthenics Victoria with products, services and other opportunities to carry out specific functions including:

- Provision of relevant products or services
- Processing of payments
- Communication of offers and promotions
- Product development, service and market research
- Technology services including application and systems, cloud computing facilities, development and technical support, processing, storing, hosting, research and data analysis
- Provision of business and other advice, including legal, accounting, financial and auditing, insurance, recruitment and other professional advice as reasonably required
- Compliance with applicable laws and regulations in order to respond to a valid legal process

Personal information will not be shared, sold, rented or disclosed other than as described in this Policy.

Some trusted service providers including technology or data storage providers may be located outside of Australia.

## 5.6 Protection of Personal Information

Personal information can be held by Calisthenics Victoria in electronic or hard copy form, either onsite or with a trusted service provider. Any trusted service provider must observe and meet information security requirements to minimise the risk of unauthorised access to, loss, misuse or unapproved alteration of personal information. In addition, Calisthenics Victoria utilises security controls and a range of resources, processes and technology controls to protect personal information.



While Calisthenics Victoria endeavours to protect the personal information of users its websites, Calisthenics Victoria cannot guarantee the security of information disclosed online. Disclosure of personal information online is at the user's risk. No method of transmission over the Internet or method of electronic storage is 100% secure. Protection of personal information can be strengthened by keeping account details confidential, limiting access, using a unique and strong password and logging out after use. Calisthenics Victoria should be notified as soon as possible if unauthorised access is suspected.

## 5.7 Sensitive Information

Sensitive information is defined in the *Privacy Act* to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will be used by Calisthenics Victoria only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With an individual's consent, or when required or authorised by law.

## 5.8 Third Parties

Where reasonable and practicable to do so, Calisthenics Victoria will collect Personal Information directly from individuals. However, in some circumstances Calisthenics Victoria may be provided with information by third parties.

Calisthenics Victoria may also collect personal information from third parties including public sources, information service providers, providers who administer Calisthenics Victoria products and services including registration, membership, payment cards and insurance and anyone authorised to act on an individual's behalf.

Certain brands, businesses and third parties that operate online own the personal information provided to them (e.g., when joining a mailing list, or recording preferences), and have their own privacy policies. Users are encouraged to read these policies before providing personal information.

Calisthenics Victoria may display advertisements from third parties and other content that links to third-party websites. Links to third party sites that are not operated or controlled by Calisthenics Victoria are provided for convenience. Clicking on a third-party advertisement or link results in re-direction away from the Calisthenics Victoria website or other social media platform, and any personal information provided will not be covered by this Policy.

Calisthenics Victoria is not responsible for the privacy practices of these third parties and this Policy does not apply to them. Certain third parties may collect sensitive information. Where personal information is provided to Calisthenics Victoria's approved third parties, Calisthenics Victoria may use this information to update and correct personal details on applicable databases.

## 5.9 Access to Personal Information

Individuals may access their personal information held by Calisthenics Victoria to update or amend it, subject to certain exceptions. Personal information may be accessed by contacting Calisthenics Victoria in writing.



Calisthenics Victoria will not charge any fee for an access request but may charge an administrative fee for providing a copy of personal information.

Calisthenics Victoria may require identification before releasing the requested information. If a third party has been authorised to submit a request on for an individual's personal information, Calisthenics Victoria will require proof that such authorisation has been granted.

There may be instances where Calisthenics Victoria cannot grant access to the personal information held, for example, if granting access would breach the privacy or confidentiality of others. If this occurs, Calisthenics Victoria will provide written reasons for refusal.

### **5.10 Correction to Personal Information**

If Calisthenics Victoria is asked to correct or amend personal information held about individuals, or if Calisthenics Victoria is satisfied that the personal information held is inaccurate, out of date, incomplete, irrelevant or misleading, Calisthenics Victoria will take reasonable steps to correct or amend that information to ensure that, having regard to the purpose for which it is held, the information is accurate, up-to-date, complete, relevant and not misleading.

If Calisthenics Victoria corrects or amends personal information, and has previously disclosed that information to another organisation that is subject to the *Privacy Act*, individuals may request Calisthenics Victoria to notify that other entity. If so, Calisthenics Victoria will take reasonable steps to do so, unless this would be impracticable or unlawful. Individuals should ensure that all personal information submitted to Calisthenics Victoria is complete, accurate, true and correct. Failure to do so may result in Calisthenics Victoria's inability to provide products and services.

A record of the changes made to personal information may be noted. Individuals should acknowledge that there may be circumstances where Calisthenics Victoria is entitled to assume such accuracy and completeness and reserves the right not to correct personal information, where permitted under relevant laws.

### **5.11 Direct Marketing**

Provision of personal information including address, email address and contact number to Calisthenics Victoria or its related parties and partners, implies consent to contact by Calisthenics Victoria for the purposes of direct marketing. Calisthenics Victoria may send this information in a variety of ways, including by mail, email, social media, SMS, MMS and telephone. Individuals may withdraw consent or opt out of receipt of direct or electronic marketing from Calisthenics Victoria at any time by:

- Contacting Calisthenics Victoria
- Using the unsubscribe facility that Calisthenics Victoria includes in its electronic messages

Personal information will not be shared, sold, rented or disclosed other than as described in this Policy.

### **5.12 Cookies**

Information is automatically collected via cookies through the use of the Calisthenics Victoria websites, apps, and electronic communications. Cookies are small text files that websites or apps may place on a computer or device. Generally, cookies are used to recognise repeat users of websites and remember user preferences. Calisthenics Victoria may collect this information both anonymously and in relation to Participant accounts, such as membership and registration. Cookies are also used to allow the website to gain statistical information about usage behaviour and aggregated data to allow Calisthenics Victoria to

customise a user's experience on their websites. The information is used and disclosed by Calisthenics Victoria for purposes including statistical analysis and to assist Calisthenics Victoria to improve the functionality and usability of the website.

## **6. POLICY OBLIGATIONS AND SANCTIONS**

### **6.1 Security of Personal Information**

Calisthenics Victoria will take all reasonable steps to ensure personal information is protected from misuse and loss and from unauthorised access, modification or disclosure.

Calisthenics Victoria may hold personal information in either electronic or hard copy form.

Calisthenics Victoria's website is linked to the internet, which is inherently insecure. As such, Calisthenics Victoria cannot provide any assurance regarding the security of transmission of information communicated to Calisthenics Victoria online.

Calisthenics Victoria also cannot guarantee that the information supplied will not be intercepted whilst being transmitted over the internet.

Accordingly, any personal information or other information transmitted to Calisthenics Victoria online is transmitted at the individual's own risk.

### **6.2 Notifiable Data Breach Scheme**

In the event of any loss, unauthorised access or disclosure of personal information that is likely to result in serious harm to an individual, Calisthenics Victoria will notify any individual concerned and the Australian Information Commissioner, as required, under the Notifiable Data Breaches Scheme. This notification will occur as soon as is practicable after becoming aware of the loss, unauthorised access or disclosure and Calisthenics Victoria will outline the steps that will be undertaken in response to the breach. <mailto:admin@calisthenics.asn.au>

### **6.3 Legal Jurisdiction**

This Policy and the use of Calisthenics Victoria's services including the website is governed in all respects by the laws of Victoria, Australia, and users agree to submit to the exclusive jurisdiction of the courts of Australia. Privacy laws in other countries may provide certain rights in relation to personal information that may not be covered under the Australian Privacy Principles. These include the right to erasure, rights to data portability and right to object. Individuals residing in those countries may wish to exercise these rights.

Further information about privacy may be obtained from the Office of the Australian Information Commissioner's website at [www.oaic.gov.au](http://www.oaic.gov.au).

## **7. MONITORING, REVIEW AND EVALUATION**

The Chief Executive Officer is responsible for implementing, monitoring, evaluating and reviewing this Policy as required from time to time.

## **8. CHANGES TO THE POLICY**

Calisthenics Victoria reserves the right to amend this Policy from time to time in accordance with relevant legislation and changing needs of Calisthenics Victoria.

Policies are downloadable from the Calisthenics Victoria Website Policy Bank.

## **9. RELATED DOCUMENTS**

Nil

## **10. ATTACHMENTS**

Nil.