

# TONGA GYMNASTICS FEDERATION PRIVACY POLICY



<b>Policy Name:</b>	<b>PRIVACY POLICY</b>
<b>Date of Approval:</b>	<b>12 SEPTEMBER 2019</b>
<b>Policy Coverage:</b>	<b>Business</b>
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## 1. Introduction

The Tonga Gymnastics Federation (TGF) is committed to providing members with the highest levels of membership service. This includes protecting members' privacy. TGF understands that privacy & proper handling of personal information is important to its members and our private policies are based on respect for international standards of information privacy protection.

This document sets out how TGF may collect, hold and use personal information. By providing your personal information to TGF, you consent to its use, storage and disclosure in accordance with this Privacy Policy.

## 2. What Is Personal Information?

"Personal information" is information or an opinion (including information forming part of a database), whether true or not, and whether recorded in material form or not, about an individual whose identity is reasonably apparent, or can be reasonably ascertained, from the information or opinion.

TGF collects personal information in order to properly and efficiently carry out its functions, including to provide you requested products and services, and to facilitate the provision of marketing and promotion services that may be of interest to you.

TGF uses personal information only for the purposes for which it was provided and for directly related purposes (unless otherwise required by or authorised under law). We may state a more specific purpose at the point we collect your information.

If you do not provide us with the information that we request, we may not be able to provide you with our products or services.

## 3. What Personal Information Does TGF Collect?

The information collected by TGF about a particular person will vary depending on the circumstances of collection. It may include, but is not limited to, a person's contact details (name, email and/or postal address, phone number), date of birth, gender, credit card details, driver's licence number, passport number, insurance details, employment history, police checks, qualifications or communication history with TGF.

### 3.1 Sensitive Information

If it is reasonably necessary in the circumstances, TGF may also collect sensitive information (which is a type of personal information) such as your medical history, nationality or disability backgrounds.

Sensitive information is afforded a higher level of privacy protection than other personal information. Where you provide sensitive information to TGF, you also provide consent to TGF collecting it in accordance with this Privacy Policy, unless you tell us otherwise.

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## 4. How TGF Collects Personal Information

To deliver and enhance the services offered by The Tonga Gymnastics Federation, certain personal information is collected. TGF collects personal information from individuals when an individual:

- registers an affiliated club
- registers to become an affiliated athlete or an affiliated coach or official
- joins a club and their details are entered into TGF 's national database
- participates in any program, activity, education course, competition or event run by TGF or a TGF affiliate
- purchases merchandise, event tickets, products or services from TGF or a TGF affiliate
- requests information from TGF, or contacts TGF via email, telephone or mail or engages with TGF via social media
- participates in a TGF survey
- accesses the TGF website
- is elected or appointed to the Board or a committee of TGF; or
- applies for employment or a committee or volunteer position with TGF or a TGF affiliate.

Personal information may also be collected where TGF is required to do so by law (for education, child protection, work health and safety laws, charitable collections, medical treatment or other legislation in Tonga).

### 4.1 Providing Information

If you do not provide some or all of the information that we request from you, this may affect TGF's ability to communicate with you or provide the requested products or services.

By not providing requested information, you may jeopardise your ability to participate in programs or competitions or apply for employment or volunteer positions with TGF or a TGF Affiliate. If it is impracticable for TGF to deal with you as a result of you not providing the requested information or consent, TGF may refuse to do so.

### 4.2 Collection from third parties

TGF or a TGF Affiliates may collect personal information regarding a child from the parent or other responsible person associated with that child.

In some circumstances, TGF collects information from TGF Affiliates or other third parties.

Examples of such third parties could include, without limitation, the Tongan Ministry of Training, Employment, Youth and Sports, Oceania Regional Anti-Doping Organisation (ORADO), Tonga government, international gymnastic associations, non-affiliated gymnastics organisations or government and law enforcement bodies as required by law.

### 4.3 Information Storage and Protection

The Tonga Gymnastics Federation stores personal information on a computer database. The personal information may be held in both paper file and computer file form. TGF has implemented measures of a reasonable nature to ensure that all personal information is securely stored from misuse, loss and unauthorised handling.

Much of the information we collect from and about our members is added to TGF 's membership database. When your information is entered into TGF's membership database, the information may be combined or linked with other information held about you.

Security of personal information is important to TGF. TGF has taken steps to protect the information we hold from misuse, loss, unauthorised access, modification or disclosure. Some of the security measures TGF uses includes strict confidentiality requirements of our employees, volunteers, TGF Affiliates and service providers, security measures for system access and security measures for our website.

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## 5. How TGF Uses Personal Information

TGF and third parties to whom we may disclose personal information in accordance with this Privacy Policy, may collect, hold and use your personal information to:

1. Verify your identity;
2. Complete background checks;
3. Research, develop, run, administer and market competitions, education courses, programs, activities and other events relating to gymnastics;
4. Research, develop and market products, services, merchandise and special offers made available by us and third parties;
5. Respond to emergency situations involving or requiring medical treatment;
6. Administer, manage and provide you with registration and access to TGF 's website;
7. Keep you informed of news and information relating to various gymnastics events, activities and opportunities via various mediums;
8. Internal accounting and administration; and
9. Regulatory reporting and compliance.

TGF may use health information to ensure that programs or tours we operate are run safely and in accordance with any special health needs participants may require. Health information may also be kept for insurance purposes. In addition, we may use de-identified health information and other sensitive information to carry out research, to prepare submissions to government, or to plan events and activities.

If TGF sends any information about services or products that is not required, or that you do not want disclosed to any other organisation (including related organisations), you can advise TGF accordingly by writing to TGF's Membership Administrator.

## 6. When We Disclose Personal Information

TGF may disclose your personal information to a range of organisations which include, but are not limited to:

1. TGF Affiliates and other organisations involved in gymnastics programs in Tonga;
2. Companies we engage to carry out functions and activities on TGF 's behalf, including direct marketing;
3. Our professional advisers, including our accountants, auditors and lawyers;
4. Our insurers;
5. Relevant sporting bodies such as the Federation Internationale de Gymnastique (FIG), Tongan Ministry of Training, Employment, Youth and Sports, Oceania Regional Anti-Doping Organisation (ORADO), various other National Gymnastics bodies, various National and district sporting bodies, competition/event management companies; and
6. In other circumstances permitted by law.

In some circumstances personal information may also be disclosed outside of Tonga, for example, information disclosed to the FIG or International Gymnast magazine. In such circumstances, TGF will use our best endeavours to ensure such parties are subject to a law, binding scheme or contract which effectively upholds principles for fair handling of the information that are suitably similar to the international standards of information privacy protection.

When you provide TGF with personal information about other individuals, TGF relies on you to make the individual aware that the information has been provided to TGF and for what purpose and to whom it may be disclosed and also how they can access their information. This is extremely important for Club owners providing the personal information of their members in TGF's national database.

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## 6.1 Direct Marketing

We will use non-sensitive personal information to provide better services and for marketing purposes (including disclosure of such information to service providers).

If you do not wish to receive e-mail, SMS or posted offers from TGF, you may opt-out by using the link provided. Alternatively, you may advise us at any time by contacting TGF via the contact details set out in this policy.

## 6.2 Other Disclosures

In addition, TGF may also disclose personal information:

1. with your express or implied consent;
2. when required or authorised by law;
3. to an enforcement body when reasonably necessary; or
4. to lessen or prevent a threat to an individual or public health or safety.

## 6.3 TGF'S Website

When you visit the TGF website, our systems may record certain information about your use of the site, including the web pages visited and the time and date of visit. TGF uses this information to help analyse and improve the performance of our website.

In addition we may use "cookies" on TGF 's website. Cookies are small text files that assist our website retain user preferences to improve the experience of using our website. In some cases, the cookies that we use may collect some personal information. TGF will treat this information in the same way as other personal information we collect. You are free to disable cookies on your internet browser to prevent this information being collected; however, you will lose the benefit of the enhanced website experience that the use of cookies may offer.

Websites linked to the TGF website are not subject to TGF's privacy standards, policies or procedures. TGF cannot take any responsibility for the collection, use, disclosure or security of any personal information that you provide to a third party website.

## 7. Accuracy Of Personal Information

TGF takes reasonable steps to ensure that whenever personal information is collected or disclosed, it is accurate, complete and up to date.

## 8. Access To Personal Information

You have a right to access your personal information, subject to some exceptions allowed by law. You can gain access to your personal information by contacting The Tonga Gymnastics Federation as set out below. You may also advise TGF at any time about possible breaches of privacy, or inaccurate, incomplete personal information that may have changed.

We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up-to-date. However, we rely on the accuracy of personal information as provided to us both directly and indirectly.

We encourage you to regularly review and update your personal information. We will respond to your request for access within a reasonable period. If you find that the personal information we hold about you is inaccurate, incomplete or out-of-date, please contact us immediately and we will correct it.

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## 9. Resolving Privacy Issues And Complaints

Any issues or complaints in relation to the collection, use, disclosure, quality, security of and access to your personal information may be made to TGF as follows:

Email: [tongagymnasticsfederation@gmail.com](mailto:tongagymnasticsfederation@gmail.com)

We will respond to your complaint within a reasonable period, and try to resolve your complaint for you.

## 10. Changes To The Policy

Changes may be made to this policy from time to time and will be updated in the official TGF policy register and circulated to the relevant parties.

In addition, The Tonga Gymnastics Federation is committed to ensuring all policies are up-to-date and reflect current practices. The latest review date is recorded at the beginning of each policy.