



OGU PRIVACY POLICY

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1. STATEMENT OF COMMITMENT

Oceania Gymnastics Union (OGU) values the privacy of every individual and is committed to the protection of personal information. OGU understands that privacy & proper handling of personal information is important. OGU policies are based on respect for international standards of information privacy protection.

2. POLICY OVERVIEW

This policy supports the principle of responsible and transparent handling of personal information by explaining what personal information OGU processes, the reasons why OGU needs to process and use it, who it is shared with and how you can exercise your rights in relation to the personal information that OGU holds about you.

The office of Oceania Gymnastics Union is based in Melbourne Australia and therefore, OGU is bound by the Australian Commonwealth Privacy Act 1988, which sets out a number of principles concerning the protection of an individual's personal information. The aim of these laws is to ensure that organisations handle personal information responsibly and provide a consistent approach to its collection, use and disclosure. These laws also give the individual rights such as access to their personal information and the ability to correct it, if needed. Before providing personal information to OGU, individuals and organisations should ensure the information being collected and transferred to OGU does not breach Privacy, Data Protection and/or any other laws within their own country.

3. SCOPE

This document sets out how OGU may collect, hold and use personal information.

This policy is binding on the OGU Board and its personnel (including paid and voluntary personnel). The Board may review, amend and enforce this policy as it deems necessary or appropriate.

Member Federations of OGU should use this policy as a guide.

OGU will take reasonable measures to educate its personnel (including paid staff and volunteers) to understand this privacy policy, collection notice requirements, privacy legislation and their obligations when handling personal information.

4. DEFINITIONS

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.

OGU collects personal information in order to properly and efficiently carry out its functions, including to provide requested products and services, and to facilitate the provision of marketing and promotion services.

A **collection notice** outlines the reasonable steps that OGU will take when it collects personal information. The reasonable steps will depend upon the circumstances that could include: the practicability and any special needs of the individual.

OGU 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). OGU may state a more specific purpose at the point information is collected.

By providing your personal information to OGU, you consent to its use, storage and disclosure in accordance with this Privacy Policy. If you do not provide OGU with the information that it requests, OGU may not be able to provide you with its products or services.

Informed consent requires that an individual must be competent to make a voluntary decision about whether to provide their personal information. In the case of a child (person below the age of 18), personnel must educate the child and a parent or guardian of the child about how the information will be used.

De-identified personal information is when the information is no longer about an identifiable individual or an individual who is reasonably identifiable.

5. WHAT PERSONAL INFORMATION DOES OGU COLLECT?

The information collected by OGU 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 OGU.

5.1 Sensitive Information

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

Sensitive information is afforded a higher level of privacy protection than other personal information, the exception being data collected for research statistic purposes, provided that this data is de-identified. Where you provide sensitive information to OGU, you also provide consent to OGU collecting it in accordance with this Privacy Policy, unless you advise otherwise.

6. HOW OGU COLLECTS PERSONAL INFORMATION

OGU collects personal information when an individual:

1. Participates in any program, activity, education course, competition or event run by OGU
2. Purchases merchandise, event tickets, products or services from OGU
3. Requests information from OGU, or contacts OGU via email, telephone or mail or engages with OGU via social media
4. Participates in an OGU survey
5. Accesses the OGU website
6. Is elected or appointed to the Board or a committee of OGU
7. Applies for employment or a committee or volunteer position with OGU

Personal information may also be collected where OGU is required to do so by law (for education, child protection, work health and safety laws, charitable collections, medical treatment or other legislation in Australia and/or in a country in which OGU is conducting an activity).

When collecting personal information about an individual, OGU will take reasonable steps, via collection notices, either to notify the individual of certain matters or to ensure the individual is aware of those matters. The matters include, but are not limited to:

1. OGU's identity and contact details;
2. The fact and circumstances of collection;
3. Whether the collection is required or authorised by law;
4. The purposes of collection;
5. The consequences if personal information is not collected;
6. OGU'S usual disclosures of personal information of the kind collected;
7. Information about OGU's Privacy Policy; and
8. Whether OGU is likely to disclose personal information to overseas recipients, and if practicable, the countries where they are located.

Some practical examples of how OGU may provide a privacy collection notice to individuals may include:

- A written notice on a form the individual is completing;
- Notice included in brochures, posters and counter signage.

An example of an OGU Privacy Collection Notice is:

"Oceania Gymnastics Union acknowledges and respects the privacy of individuals. The information collected on this form is for the purposes of enrolling in an education course and associated functions. Information provided in this form is collected, used and disclosed in accordance with our privacy policy (available at https://oceaniagymnastics.org/wp-content/uploads/2020/04/Privacy_Policy_Oceania_Gymnastics_Union.pdf). The information in this form may be used by us and other third-parties, or as required by law. By completing this form, you consent to us using the information in accordance with our privacy policy. Our services may be ceased if requested information is not provided. You may access and alter personal information in accordance with the privacy policy via email oceaniagymnastics@gmail.com"

6.1 Providing Information

There may be instances where an individual does not wish to participate or take advantage of all of OGU's activities and so may prefer to withhold certain information. If you do not provide some or all of the information that OGU requests from you, this may affect OGU'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 OGU. If it is impracticable for OGU to deal with you as a result of you not providing the requested information or consent, OGU may refuse to do so.

There may be instances where an individual has the option to not give certain details (such as an email address, phone number or even name). OGU will make this clear at the time of collection.

6.2 Collection from Third Parties

OGU may collect personal information regarding a child from the parent or other responsible person associated with that child. In some circumstances, OGU collects information from OGU member federations or other third parties.

Examples of such third parties could include, without limitation, Ministries of Sport, Oceania Regional Anti-Doping Organisation (ORADO), governments, The International Gymnastic Federation (FIG), national gymnastics federations, non-affiliated gymnastics organisations or government and law enforcement bodies as required by law.

6.3 Information Storage and Protection

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

Security of personal information is important to OGU. OGU has taken steps to protect the information it holds from misuse, loss, unauthorised access, modification or disclosure. Some of the security measures OGU uses include strict confidentiality requirements of our employees, volunteers, OGU member federations and service providers, security measures for system access and security measures for our website.

7. HOW OGU USES PERSONAL INFORMATION

OGU and third parties to whom it 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 OGU and third parties;
5. Respond to emergency situations involving or requiring medical treatment;
6. Administer, manage and provide you with registration and access to OGU's website;
7. Keep you informed of news and information relating to various gymnastics events, activities and opportunities via various mediums;
8. Record in internal accounting and administration processes; or
9. Include in regulatory reporting and compliance documentation.

OGU may use health information to ensure that activities or tours it operates 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, OGU may use de-identified health information and other sensitive information to carry out research, to prepare submissions to governments, or to plan events and activities.

If OGU 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 OGU accordingly by emailing the Oceania Gymnastics Union Secretary General at oceaniagymnastics@gmail.com.

8. WHEN OGU DISCLOSES PERSONAL INFORMATION

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

1. OGU member federations and other organisations involved in gymnastics programs in Oceania;
2. Companies OGU engages to carry out functions and activities on its behalf, including direct marketing;
3. OGU professional advisers, including accountants, auditors and lawyers;
4. OGU insurers;
5. Relevant sporting bodies such as FIG, ministries of sport, ORADO, various other national gymnastics bodies, international and national sporting bodies, competition/event management companies; or
6. In other circumstances permitted by law.

When you provide OGU with personal information about other individuals, OGU relies on you to make the individual aware that the information has been provided to OGU, for what purpose, to whom it may be disclosed and also how they can access their information.

8.1 Direct Marketing

OGU will use non-sensitive personal information to provide improved 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 OGU, you may opt-out by using the link provided. Alternatively, you may advise OGU at any time via the contact details set out in this policy.

8.2 Other Disclosures

In addition, OGU 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.

8.3 OGU's Website

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

In addition, OGU may use "cookies" on the OGU website. Cookies are small text files that assist websites to retain user preferences to improve the experience of using the website. In some cases, the cookies that OGU uses may collect some personal information. OGU will treat this information in the same way as other personal information collected. 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 OGU website are not necessarily subject to OGU's privacy standards, policies or procedures. OGU cannot take any responsibility for the collection, use, disclosure or security of any personal information that you provide to a third-party website.

8.4 Social Networking Services

OGU sometimes uses social networking services such as, but not limited to Twitter, Facebook, Facebook Messenger, Instagram, Snapchat, Tik Tok, LinkedIn, Reddit, Pinterest and YouTube to communicate with the public about OGU activities or achievements. If you choose to communicate with OGU using these services, OGU may collect your personal information and use it to communicate with you. In the event that OGU wishes to use the personal information (e.g. name) in a social media post, OGU shall request such permission from you, a parent or guardian.

The social networking service may also collect or handle your personal information and use it for its own purposes. These services have their own privacy practices and policies. OGU is unable to regulate the actions of those services. This policy does not apply to the acts or practices of those services.

8.5 Cross Border Disclosure of Personal Information

OGU may disclose personal information outside of Australia, for example, information disclosed to member federations, the FIG or International Gymnast magazine. In such circumstances, OGU will use its 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 Australian and international standards of information privacy protection. Should OGU be required to send personal information overseas, the individual shall be informed of this event and notified of the practical effect and potential consequences of giving their informed consent for the disclosure.

8.6 Third Party Comments

Social Media platforms such as Facebook encourage a bilateral communication method. Third-party users have the ability to respond to OGU social media web pages. Third parties should not abuse this privilege when interacting with OGU content.

OGU promotes the safe use of social media. When engaging in social media activities, such as content creation and responding to comments, OGU will take reasonable measures to review content posted to OGU Social Media websites.

OGU will take reasonable measures to respond to inappropriate third-party user comments by removing defamatory content within a reasonable time period. This includes a duty to report to authorities and respond to any incidents of child abuse.

10. 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 OGU as set out below. You may also advise OGU at any time about possible breaches of privacy, or inaccurate, incomplete personal information that may have changed.

OGU will take reasonable steps to ensure that the personal information it collects, uses or discloses is accurate, complete and up to date. However, OGU relies on the accuracy of personal information as provided to it both directly and indirectly.

OGU encourages you to regularly review and update your personal information. OGU will respond to your request for access within a reasonable period. If you find that the personal information that OGU holds about you is inaccurate, incomplete or out of date, please contact OGU immediately and it will be corrected.

11. HOW OGU DISPOSES OF PERSONAL INFORMATION

OGU will take reasonable steps to:

1. Ensure the security of the personal information it holds, and to actively consider whether it is permitted to retain personal information;
2. Protect personal information it holds from misuse, interference and loss, as well as unauthorised access, modification or disclosure;
3. Destroy personal information or ensure it is de-identified if it no longer needs the information for any purpose for which it may be used or disclosed.

This requirement applies except where:

1. The personal information is part of a Commonwealth record, or
2. The OGU is required by law or a court/tribunal order to retain the personal information

12. 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 OGU via email:

oceaniagymnastics@gmail.com

OGU will respond to your complaint within 30 days, and try to resolve your complaint within 90 days. OGU will follow its Grievance Procedure which can be found within the OGU Discipline, Grievance and Appeals Policy <https://oceaniagymnastics.org/about-us/policies/>

If OGU is unable to resolve your complaint within this time or you are not satisfied with the outcome, you can contact the Office of Australian Information Commissioner via this link: <https://www.oaic.gov.au/privacy/privacy-complaints/lodge-a-privacy-complaint-with-us/>

13. CHANGES TO THE POLICY

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

In addition, Oceania Gymnastics Union 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.