

PRIVACY POLICY

Introduction

From time to time, Maccabi Australia Inc. and its affiliated state representative bodies (Maccabi) may be bound to comply with the Privacy Act 1988 (Cth) (Act) and the Australian Privacy Principles (or APPs) set out in that Act. Whether or not it is bound at a particular time, Maccabi aims at all times to deal with the personal information of individuals in a way that is consistent with the APPs.

This Policy describes Maccabi's approach to dealing with personal information.

The Purposes for Which Maccabi Collects, Holds, Uses and Discloses Personal Information

Maccabi Australia (MAI) is Maccabi's roof body; whose state membership organisations oversee Maccabi Club sports activity. The clubs provide organised sport at the grass roots level across 23 different sporting codes. MAI provides pathway opportunities for its members to attend and participate in national sporting events like Junior Carnival and international events such as the Maccabiah Games and the Pan American Maccabi Games and others. Ultimately, Maccabi aims to deliver participation and development opportunities for Jewish Australian athletes through the club structure and provide further opportunities for involvement in various programs and events that have a health and wellness leaning. MAI works with the state bodies to develop the organisation through collaboration and alignment and improved effectiveness. As a membership-based organisation, Maccabi use the personal information that we collect to enable us to conduct our operations, to provide our services to you, to carry on our marketing activities and for other reasonably foreseeable purposes, including:

- to consider applications for membership;
- to register memberships;
- to communicate with you;
- to consider applications for employment;
- to comply with our legal, financial and reporting obligations;
- to enhance our activities and services;
- for research, planning, service development, security or risk management; and
- to communicate with third parties in respect of athlete funding and otherwise in relation to our provision of activities and services to you.

Where you have provided your consent for us to do so, we may also use personal information that we have collected to periodically send you emails, including about new developments or other information which we think you may find interesting. You can opt out of these communications at any time.

The Kinds of Personal Information That Maccabi Collects and Holds

In undertaking its activities Maccabi, at its various levels, collects 'personal information'. This may include (but is not limited to) a person's name, address, telephone number, postcode, email address, and other contact details, date of birth, occupation, and financial records. The personal information that Maccabi holds will depend on the nature of the activity or service we are providing to you. Maccabi Australia will only collect personal information to the extent relevant for the relationship it has with each person.

Maccabi also holds sensitive personal information, for example about an employee or an athlete. This may include information about health, family background, disability, criminal convictions, personnel files, employment histories and tax file numbers.

Recognising that the Privacy Act places restrictions on collecting sensitive personal information about person. Maccabi may collect sensitive information when:

- providing health services to persons (for example to an athlete)
- providing sport services to persons (for example to an athlete)
- it is required to provide specific services (for example in allocating specifically targeted funding)
- assessing eligibility for employment (potential or existing employees)
- for the purpose of maintaining the employee/employer relationship
- for the purpose of meeting legal employment obligations

However, we will not do so unless we are authorised by law or otherwise have your express consent.

You are entitled to remain anonymous or use a pseudonym when dealing with us, unless:

- you are required by law to use your real name; or
- it is impracticable for us to deal with you without using your real name.

However, please note that if we do not collect, hold, use or disclose your personal information, then we may not be able to provide our services to you.

If Maccabi conducts online collaboration, social media or market research, it may also ask for public opinions about its services or staff. These will be treated as personal information if they contain personally identifiable information.

How Maccabi Collects and Holds Personal Information

If it is reasonable and practical to do so, Maccabi will collect personal information directly from the persons concerned with their consent. This may be through application forms, over the telephone, the Internet, or in person.

Maccabi may also need to collect personal information from other people or organisations. This information is collected with the person's consent, except for in circumstances allowed for by legislation. Sometimes this may happen without direct involvement. Some examples of the people or organisations from which Maccabi may collect personal information are:

- sporting organisations
- publicly available sources of information (such as telephone directories)
- person's representatives (such as a parent, coach, legal adviser, manager)
- person's employers
- other government agencies
- law enforcement agencies

Where Maccabi have collected your personal information by indirect means, we will take reasonable steps to inform you that we have your personal information.

So that Maccabi can better tailor information and services to individual needs, when it sends email messages, it may use technology to identify persons to know when an email is opened or links within an email are used.

If persons log into Maccabi intranet/extranet services, information may be collected from them to confirm their identity.

Maccabi will hold the information it collects on electronic systems, and where appropriate in paper format.

Maccabi may also hold or receive some information on cloud-based systems. Where this occurs, Maccabi will require the relevant service to be compliant with its privacy and security standards in protecting personal information.

How Maccabi Will Keep Personal Information Accurate and Up-To-Date

Maccabi seeks to maintain the quality of its information holdings by taking reasonable administrative and technical steps to make sure that the information collected, used and disclosed is accurate, complete and up-to-date.

If we discover that the personal information we hold about you is not accurate, or if you make a written request to us with respect to your personal information, wherever practicable and appropriate we will provide you with access to, or take steps to correct the personal information that we hold about you.

How Maccabi Will Keep Information and Data Secure

Paper documents are protected from unauthorised access or use through the various security systems that we have over our physical premises. We also aim to maintain up-to-date computer and network security systems with appropriate firewalls, access controls and passwords to protect electronic copies of personal information.

All Maccabi employees, athletes and other participants in Maccabi activities are bound by the *Maccabi Code of Conduct* to not misuse personal information. Those who perform services on Maccabi's behalf are also bound by agreements that include privacy clauses.

If we no longer require an individual's personal information, we will generally take reasonable steps to destroy it in a secure manner or remove identifying features from it. This is subject to any legal obligation (such as the *Archives Act, 1983*) that requires Maccabi to keep information for a certain period of time.

In What Circumstances Would Maccabi Provide Personal Information to Others, Including Overseas Providers

Sometimes Maccabi may provide personal information to external organisations. Generally, these are organisations that help Maccabi conduct its programs and activities. These organisations may include:

- sport partners (sporting organisations, including those overseas with whom we have agreements to provide funding or services)
- other organisations to which we are affiliated (for example the Jewish Communal Appeal (JCA) in NSW)
- cloud based services that host Maccabi data on its servers
- authorised representatives of Maccabi
- superannuation funds
- payment systems operators (for example, our online facility to receive credit card payments)
- our accountants, auditors or lawyers
- a person's representatives (for example a parent, coach, legal adviser, manager)

Maccabi strives to limit the information it provides to outside organisations to what they need to provide their services to us - or to provide services to Maccabi members. We will not disclose any personal information unless you consent to such disclosure or we are required or permitted to do so by law.

Maccabi requires any organisation that it contracts with to use the personal information provided only for the purposes of the specific service being provided to Maccabi, and for no other purpose. We work with these organisations to ensure that your personal information is handled in accordance with the APPs.

Maccabi may also need to provide personal information to others outside Maccabi where:

- Maccabi is required to by law or has a public duty to do so. For example, a Court, a regulator (such as the Australian Taxation Office or the police can compel Maccabi to disclose personal information to them);
- the information relates to a sports drug and safety matter or is otherwise relevant to the performance of the functions of the Australian Sports Anti Doping Authority and as such may be provided to the Australian Sports Anti Doping Authority; or
- persons have expressly consented to their personal information being supplied to others for particular purposes.

We may request your consent to disclose your personal information for a particular purpose. In other circumstances, you may be deemed to have given your consent, including where you indicate to us that you wish to obtain information from any of our affiliated third parties about their activities, or the services that they provide.

We may need to disclose some of your personal information to an overseas recipient, in the course of providing our products and services to you. However, we will only do so where:

- such disclosure is necessary for us to provide our products and services to you; and
- you have provided your consent; or
- we reasonably believe that the recipient is required to deal with the personal information in accordance with laws which are similar to the APPs and will keep the personal information secure and use it only for the purpose for which it was collected; or
- we are otherwise permitted or required by law or court order.

Access to Personal Information Held by Maccabi and to Correction of That Information

Any person who believes that Maccabi holds personal information about them may contact Maccabi to seek access to that information. In most cases, Maccabi will provide access, although there might be reasons why Maccabi considers this inappropriate – for example where access would involve infringing on another person's privacy.

If after accessing information held about any person, they consider that it is inaccurate, out-of-date, incomplete, irrelevant or misleading for the purposes for which it is held, then they may request Maccabi to amend it or where applicable log into the Maccabi website and change it themselves. In most cases, Maccabi will amend or permit the person to amend the information.

In the first instance a person can request access to their personal information by contacting Maccabi.

By post: Office Manager Maccabi Australia
1/115 Hawthorn Rd, Caulfield North VIC 3161 Tel. +61 3 9563 5865

By email: enquiries.mai@maccabi.com.au

Complaints

Maccabi aims to be efficient and fair when responding to any privacy complaint.

Any privacy complaints to Maccabi must be made in writing to the Maccabi Australia President and/or Office Manager. Maccabi aims to respond to all complaints within a reasonable time period.

If you are dissatisfied with any decision made by us in relation to your complaint, you have the right to refer your complaint to the Office of the Australian Information Commissioner on 1300 363 992 or at enquiries@oaic.gov.au.

Roles and Responsibilities

The overall responsibility for the management of Maccabi privacy ultimately resides with the Maccabi Australia President and Office Manager. However, authority and responsibility for the management and use of personal information is delegated and assigned at all levels.

Privacy is a shared responsibility and all Maccabi system users are responsible for implementing privacy policies and practices.

Contact for this Policy

Maccabi Office Manager

Email: c/- enquiries.mai@maccabi.com.au Tel. +61 3 9563 5865

Amending this Privacy Policy

If Maccabi amend this Privacy Policy, any updated version will be posted on our website.

AUGUST 2021- END –