



Maccabi Australia Inc

privacy policy

1 Introduction

- 1.1 Maccabi Australia Inc. (**MAI**) and its affiliated state representative bodies (**Maccabi, we, our, us**) aim to deal with Personal Information in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**) and the 13 Australian Privacy Principles (**APPs**) comprised in the Privacy Act.
- 1.2 This policy sets out Maccabi's approach to dealing with Personal Information.
- 1.3 Under the Privacy Act, **Personal Information** means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not.
- 1.4 Personal Information includes **Sensitive Information**, which is defined under the Privacy Act as information or an opinion about a person's race, ethnic origin, political opinions, membership of political associations and trade associations, religious or philosophical beliefs, sexual orientation or practices, criminal record, health information, genetic information about an individual that is not otherwise health information, biometric information that is used for the purpose of automated biometric verification or biometric identification and biometric templates.

2 The purposes for which Maccabi collects, holds, uses and discloses Personal Information

General

- 2.1 Maccabi may collect, hold, use and disclose Personal Information for the following purposes:
- (a) to enable us to conduct our operations, which include providing our services to you or enabling you to participate in our activities;
 - (b) to carry on our marketing activities (including direct marketing activities);
 - (c) to verify your identity when it is necessary to provide services to you or to enable you to participate in our activities, or when logging into our extranet services or websites;
 - (d) to consider your applications for membership or participation;
 - (e) to register your membership or participation;
 - (f) to communicate with you regarding our activities and respond to your requests and inquiries;
 - (g) to comply with our legal, financial and reporting obligations;
 - (h) to enhance our activities and services;
 - (i) for fundraising purposes, including administration;
 - (j) for research and planning for the purpose of our activities and other operations;
 - (k) for security or risk management, including protecting the Maccabi community against antisemitism and terrorism;

- (l) to procure athlete funding on your behalf and otherwise in relation to our provision of activities and services to you; and
- (m) to engage in other activities where required or permitted by law or where you have given your consent.

Direct marketing

- 2.2 If you have provided your consent for us to do so, we may also use your Personal Information that we have collected to periodically send you direct marketing 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 by using the 'unsubscribe' function on our emails.

Job applications

- 2.3 If you have submitted an application for employment with Maccabi, we collect, hold and use your Personal Information to consider your application by:
- (a) assessing your suitability for the role;
 - (b) verifying your identity, qualifications, certifications, entitlement to work and working with children clearance; and
 - (c) conducting other background or criminal history checks.

3 The kinds of Personal Information that Maccabi collects and holds

- 3.1 Maccabi aims to only collect Personal Information that is reasonably necessary for the relationship it has with each person. That is, the Personal Information that we collect and hold about you will depend on the nature of the activity in which you participate or the service we are providing to you.
- 3.2 Maccabi collects various types of Personal Information, which may include (but is not limited to) your:
- (a) name, address, telephone number, postcode, email address, and other contact details;
 - (b) date of birth, occupation, and financial records;
 - (c) ethnic origin;
 - (d) religious beliefs or affiliations;
 - (e) information relating to your use of our services or participation in our activities that allow us to improve or personalise that use or participation, such as details about your interactions with our services and device identifiers (eg IP address);
 - (f) if you are applying for a career opportunity with us: government identifiers (eg tax file number), health information, family background, disability information (if any), background check information (eg previous criminal convictions), personnel files, and employment histories;
 - (g) if you are an athlete: health information and registration details with sporting associations.

4 Anonymity or pseudo-anonymity

- 4.1 You are entitled to remain anonymous or use a pseudonym when dealing with us. However, in some circumstances we may require your Personal Information in order to provide you with our services or properly respond to any questions, concerns or inquiries you may have. These circumstances include if:
- (a) you are required by law to use your real name; or
 - (b) it is impracticable for us to deal with you without using your real name.

- 4.2 If you do not provide the Personal Information requested by us, then we may not be able to provide our services to you or enable you to participate in our activities.

5 How Maccabi collects Personal Information

General

- 5.1 If it is reasonable and practical to do so, Maccabi aims to collect Personal Information directly from you with your consent. For example, you will indicate your consent by completing a membership application form, privacy consent form or by submitting queries, feedback or otherwise communicating with us over the telephone, the Internet (that is, through our website or social media pages), or in person.
- 5.2 Maccabi may collect your Personal Information from other people or organisations in circumstances where it is unreasonable or impracticable for us to collect your personal information directly from you. Sometimes this may happen without your direct involvement. Some examples of the people or organisations from which Maccabi may collect Personal Information are:
- (a) sporting organisations – for example, if we receive information from a sporting association, or from Maccabi World Union, if you have registered for an activity with that organisation;
 - (b) software providers – for example, if we use a third party system to register athletes to play;
 - (c) publicly available sources of information (such as telephone directories or social media);
 - (d) your representatives (such as a parent, coach, legal adviser, manager);
 - (e) your employers;
 - (f) other government agencies, such as Sport Integrity Australia; and
 - (g) law enforcement agencies.
- 5.3 If Maccabi has collected your Personal Information by indirect means, we aim to take reasonable steps to inform you that we have done this.

Sensitive information

- 5.4 Maccabi collects Sensitive Information directly from you when:
- (a) if you are an athlete, providing health services or sport services to you;
 - (b) it is required to provide specific services (for example in allocating specifically targeted funding);
 - (c) if you have applied for employment with us, assessing eligibility for employment (potential or existing employees).
- 5.5 We aim only to collect Sensitive Information both with your consent and where it is reasonably necessary for our activities, or if the collection is required by law or a court or tribunal order.
- 5.6 Maccabi generally holds the information it collects on electronic systems, and sometimes in paper format. Further information about how we hold Personal Information is set out in section 6 below.

6 How Maccabi keeps information and data secure

- 6.1 We strive to take reasonable steps and maintain technical and organisational measures to protect your Personal Information we hold from misuse, interference and loss as well as unauthorised access, modification or disclosure.
- 6.2 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.

- 6.3 Maccabi also holds and receives some information on cloud-based systems. Maccabi's agreements with the relevant service providers require them to comply with Maccabi's privacy and security standards in protecting Personal Information.
- 6.4 All Maccabi employees, athletes and other participants in Maccabi activities are bound by the *Maccabi Code of Conduct* (available at: <https://maccabi.com.au/integrity-policies/>) not to misuse Personal Information. Those who perform services on Maccabi's behalf are also bound by agreements that include privacy clauses.
- 6.5 However, we cannot and do not guarantee that Personal Information we hold will be protected against unauthorised access or misuse. Unfortunately, no system or methodology for holding Personal Information can be guaranteed as entirely secure.
- 6.6 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. We may retain your personal information where we are required or permitted to do so by law (such as, under the *Archives Act 1983* (Cth)).

7 In what circumstances would Maccabi provide Personal Information to others, including overseas providers

- 7.1 Sometimes Maccabi may provide Personal Information to external organisations. Generally, these are organisations that help Maccabi conduct its programs and activities, and may include:
- (a) State affiliates of Maccabi and their affiliated clubs, and Maccabi funding organisations;
 - (b) our sport partners (sporting organisations, including those overseas with whom we have agreements to provide funding or services);
 - (c) other organisations to which we are affiliated (for example the Jewish Communal Appeal (**JCA**) in NSW);
 - (d) cloud based services that host Maccabi data (including data comprising your Personal Information) on its servers;
 - (e) authorised representatives of Maccabi, such as our lawyers and accountants;
 - (f) payment systems operators (for example, our online facility to receive credit card payments);
 - (g) our accountants, auditors or lawyers; and
 - (h) your representatives (for example a parent, coach, legal adviser, manager).
- 7.2 Maccabi strives to limit the information it provides to external organisations to the information they reasonably need to provide their services to us or to Maccabi members.
- 7.3 Maccabi generally ensures that such organisations are contractually required to ensure that the information we disclose is only used for the limited purposes for which we provide it, and is handled in accordance with the Privacy Act and APPs.
- 7.4 Maccabi may also need to provide Personal Information to others outside Maccabi if:
- (a) Maccabi is required to by law or has a public duty to do so. For example, a Court, regulator (such as the Australian Taxation Office) or the police can compel Maccabi to disclose Personal Information to them in certain circumstances;
 - (b) 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
 - (c) you have expressly consented to your Personal Information being supplied to others for particular purposes.

- 7.5 We may need to disclose some of your Personal Information to our partner sports organisations and service providers that are located outside of Australia (including in Israel – such as Maccabi World Union – and the USA) in the course of providing our products and services to you. However, we will generally only do so with your consent or if we are required to or authorised to do so by law.
- 7.6 By providing us with your Personal Information, you consent to us using, transferring, storing, processing or disclosing your Personal Information outside of Australia. In providing this consent, you understand and acknowledge that:
- (a) Australian Privacy Principle 8.1 does not apply to our disclosure of your Personal Information; and
 - (b) countries outside of Australia do not always have the same privacy protection obligations as Australia in relation to Personal Information. However, we strive to take reasonable steps to ensure that any third parties based outside Australia to whom we disclose your Personal Information, use and hold your Personal Information in a secure manner.
- 7.7 If you do not agree to the disclosure of your Personal Information outside Australia, you should not submit your Personal Information to us.

8 Third party websites

Our website may include links to other websites or services operated by third parties, including for example for registrations. This privacy policy does not apply to the data processed by such third-party websites or services, and we have no control over the actions of those third parties in respect of your Personal Information.

9 Access to Personal Information held by Maccabi and to correction of that information

- 9.1 You may contact us to request access to, or the correction of, the Personal Information we hold about you. Contact details are below at section 11
- 9.2 We may refuse to allow access or to amend your personal information if we are legally required or permitted to do so. In that case, we will generally (unless it is unreasonable to do so) provide you with written reasons for the refusal together with information about the options available to complain about the refusal.
- 9.3 We aim to respond to your request for access within a reasonable period after the request is made and we will give access to the information in the manner requested if it is reasonable and practicable to do so. We may require you to comply with certain procedures before we allow access to or amendment of your Personal Information (eg providing satisfactory identification), in order to ensure the integrity and security of information that we hold. Please understand that our requirements to identify individuals requesting access to personal information are designed to protect you and other individuals from unauthorised access.
- 9.4 We may require you to pay certain costs in order to access your Personal Information held by us. We will advise the amount payable (if any) once we have assessed your application for access. However, we will not charge a fee for you to lodge a request for access to or correction of your Personal Information.
- 9.5 We aim to take reasonable steps to ensure that the Personal Information we collect is accurate, up-to-date and complete, and the Personal Information we use and disclose is accurate, up-to-date, complete and relevant.

10 Complaints

- 10.1 If you have a complaint about our handling of your Personal Information, or you believe that a breach of your privacy has occurred, please contact us using the contact details in section 11 below. Maccabi aims to respond to all complaints within a reasonable time period.

- 10.2 If you are dissatisfied with any decision made by MAI in relation to your complaint, you have the right to make a complaint to the Office of the Australian Information Commissioner as set out here: <https://www.oaic.gov.au/privacy/privacy-complaints/lodge-a-privacy-complaint-with-us>.

11 Contact for this Policy

Attention: Maccabi Australia General Manager
Email: c/- privacy@maccabi.com.au

12 Amending this Privacy Policy

Maccabi may amend this Privacy Policy at any time; and if it does so, the updated version will be posted on our website.

EFFECTIVE FROM: December 2025