

CROYDON AND DISTRICT OBEDIENCE DOG CLUB

# PRIVACY POLICY

(Effective November 2021)

## 1. Application

This Privacy Policy applies to Personal Information handled by the Croydon and District Obedience Dog Club Inc. (CDODC).

## 2. Definitions

In this document these terms have the following meanings:

<b>Australian Privacy Principles</b>	The Australian Privacy Principles are the principles located at Schedule 1 to the Privacy Act.
<b>COVID-19 Pandemic</b>	COVID-19 Pandemic means the period of time in which the severe acute respiratory syndrome coronavirus 2 (SARS-CoV-2) virus and related strains pose a foreseeable risk to Australian residents.
<b>Personal Information</b>	Personal Information has the same meaning as set out in the Privacy Act.
<b>Privacy Act</b>	Privacy Act means the <i>Privacy Act 1988</i> (Cth).
<b>Privacy Policy</b>	Privacy Policy means this policy.
<b>Sensitive Information</b>	Sensitive Information has the same meaning as set out in the Privacy Act.

### **3. About this Privacy Policy**

- 3.1. CDODC is committed to protecting the privacy of individuals with whom it interacts and voluntarily handles Personal Information in accordance with the Australian Privacy Principles.
- 3.2. In this Privacy Policy, 'Personal Information' has the same meaning as set out in the Privacy Act. In essence, Personal Information is information or an opinion about an individual who is reasonably identifiable.
- 3.3. 'Sensitive Information' also has the same meaning as set out in the Privacy Act. Sensitive Information is a subcategory of Personal Information which relates to areas where prejudices may prevail, such as sexual preferences or religious beliefs. Sensitive Information is subject to stricter handling requirements than Personal Information.
- 3.4. This Privacy Policy sets out CDODC's policies and practices regarding the management of Personal Information, including how CDODC collects Personal Information, its purposes for collection, and to whom Personal Information will be disclosed.
- 3.5. Where applicable, CDODC will handle Personal Information in accordance with exemptions under the Privacy Act. For the avoidance of doubt, the employee record exemption does not apply to CDODC's volunteers, and volunteer records are handled in accordance with this Privacy Policy.

### **4. What Personal Information does CDODC collect and why does it collect it?**

#### *Members, volunteers, visitors and sporting competitors*

- 4.1. CDODC collects Personal Information from its members and volunteers for the purposes of processing membership applications, making contact about classes, and organising involvement in dog sports and related competitions. If you are a visitor or competitor at a CDODC event or competition, CDODC may collect Personal Information about you for the purposes of running the event or competition.
- 4.2. CDODC may collect contact details from you including your name, address, phone number, email address, Victorian Canine Association (Dogs Victoria) membership number, birth date, age, credit card number and other credit card details. If you require a refund from CDODC, we may also collect your bank account details for remittance.

- 4.3. In addition to the types of Personal Information outlined above, CDODC may collect Personal Information about you as otherwise permitted or required by law.

*Sensitive information*

- 4.4. CDODC may also collect Sensitive Information about you in the following circumstances:
- 4.4.1. if you are or become a CDODC volunteer, member, visitor, or competitor during or after the COVID-19 Pandemic, we may collect health information about you relating to your COVID-19 vaccination status. Collecting and recording your COVID-19 vaccination status may be required by government restrictions, government directions, Victorian Canine Association (Dogs Victoria) policy or CDODC policy, for the purpose of ensuring the health and safety of our volunteers, members, visitors and competitors; and
- 4.4.2. if you apply to become a volunteer at CDODC, CDODC may collect the results of police checks from you. This information is used to consider your suitability for available positions at the club.
- 4.5. Except as stated above, CDODC does not generally request that you disclose any Sensitive Information (such as details of your religious beliefs, sexual orientation, or health information) to the club. If you do provide Sensitive Information to CDODC for any reason, including where the information is requested by us, you consent to us collecting that information and to our use and disclosure of that information for the purpose for which you disclosed it to us, as permitted by the Privacy Act and other relevant laws.

*Use of CDODC website*

- 4.6. When you use the CDODC website, CDODC may collect your website usage information, such as your IP address, the name of your internet service provider, your browser version, the website that referred you to us, the next website you go to, the pages you request, the date and times of those requests, and the country in which you are located. Except where you provide it to us via the website, we do not collect Personal Information such as your name, address, email address or phone number when you are browsing our website.
- 4.7. CDODC may use technology such as 'cookies' on its website and in emails you receive from the club. A 'cookie' is a small data element stored by your web browser on your computer system. CDODC cookies do not store your Personal

Information and are used to generate statistics and measure site activity. When you visit the CDODC website, you may receive certain customised information based on the data stored in your cookie. The use of 'cookies' is an industry standard and helps CDODC to monitor the effectiveness of its advertising and how visitors use its website.

#### *Use of Better Impact and other linked sites*

- 4.8. This Privacy Policy applies to the CDODC website and does not apply to:
  - 4.8.1. third-party website Better Impact, which CDODC uses to manage its database of members and volunteers; or
  - 4.8.2. any other websites linked through the CDODC website.
- 4.9. CDODC encourages you to read the privacy policy of each website that collects your Personal Information to ascertain how your Personal Information is being handled by that website.

## **5. How does CDODC collect Personal Information?**

CDODC collects Personal Information in a number of ways. The most common sources from which we may collect your Personal Information are:

- 5.1. directly from you when you provide it to us, for example when you apply to become a member with us or contact us through our social media or website;
- 5.2. from publicly available sources; or
- 5.3. from the Victorian Canine Association (Dogs Victoria) and other dog obedience clubs, when you register to attend or compete in our events and competitions.

## **6. For what purposes does CDODC hold, use and disclose Personal Information?**

- 6.1. The purposes for which CDODC uses and discloses your Personal Information will depend on the circumstances in which we collect it. Wherever practical CDODC will endeavour to inform you why your Personal Information is being collected, how CDODC intends to use that information, and to whom CDODC intends to disclose the information at the time it is being collected.
- 6.2. By law, CDODC may disclose your Personal Information:
  - 6.2.1. for the purposes for which we collected it (and related purposes which would reasonably be expected of you);

- 6.2.2. for other purposes to which you have consented; and
- 6.2.3. as otherwise permitted or required by law.
- 6.3. In general, CDODC collects, uses and discloses your Personal Information so that we can work with you, operate our programs, and continue to develop our club.
- 6.4. Some of the specific purposes for which CDODC uses and discloses Personal Information are:
  - 6.4.1. to process membership and volunteer applications;
  - 6.4.2. to verify your identity;
  - 6.4.3. to provide services to you;
  - 6.4.4. to maintain contact with you;
  - 6.4.5. to respond to your requests for information;
  - 6.4.6. to provide you with newsletters and other information about CDODC and its activities; and
  - 6.4.7. to monitor, report on and improve our services and programs.
- 6.5. CDODC may also use and disclose your Personal Information for the purpose of direct marketing to you where you have consented to us doing so, or where otherwise permitted by law. You can unsubscribe from our direct marketing, or change your contact preferences, by contacting us using our contact details in **section 13** below.

## **7. To whom is Personal Information disclosed?**

- 7.1. CDODC may disclose your Personal Information to third parties in connection with the purposes described above. This may include disclosure to the following types of third parties:
  - 7.1.1. our data management providers, including Better Impact;
  - 7.1.2. the Victorian Canine Association (Dogs Victoria) and other dog obedience clubs;
  - 7.1.3. our contractors, including debt collectors, insurance providers, website and data hosting providers, cloud storage providers and other IT suppliers;
  - 7.1.4. ambulance or other emergency services;

- 7.1.5. the Maroondah Council;
  - 7.1.6. other persons who perform services for or in connection with us;
  - 7.1.7. our professional advisors, including but not limited to our accountants, lawyers, insurers and auditors;
  - 7.1.8. any third parties to whom you have directed or permitted us to disclose your Personal Information;
  - 7.1.9. third parties that require the information for law enforcement or to prevent a serious threat to public safety; and
  - 7.1.10. as otherwise permitted or required by law.
- 7.2. CDODC will not sell your Personal Information to another organisation for that organisation's unrelated, independent use.
- 7.3. Where CDODC discloses your Personal Information to third parties, we will use reasonable commercial efforts to ensure third parties only use your information as reasonably required for the purpose for which it was disclosed to them, and in a manner consistent with the Privacy Act.
- 7.4. If you share Personal Information to public parts of our website or social media pages, you acknowledge that such information may be available to and viewed by the public. CDODC encourages you to use discretion in deciding what information to share on such sites.

## **8. Does Personal Information leave Australia?**

- 8.1. Some of the third parties to whom we disclose Personal Information may be located outside Australia. The countries in which these third parties are located will depend on the circumstances. In the ordinary course of business, we store information on cloud servers which may be located in the United States of America, Canada, and the United Kingdom.
- 8.2. Except where an exception applies under the Privacy Act, we will take reasonable steps to ensure that such overseas recipients do not breach the Privacy Act in relation to your Personal Information.

## 9. Security of Personal Information

- 9.1. CDODC endeavours to operate as a paperless organisation. CDODC protects your Personal Information by using secure online storage processes. Any hard copy documents are secured in locked facilities.
- 9.2. Only CDODC volunteers who have been authorised by the club may access and amend Personal Information.

## 10. Accessing and correcting Personal Information

- 10.1. If we have retained Personal Information we have collected about you, you may access it subject to any exceptions under relevant laws. We ask that you provide us with a written application to request access to your Personal Information, and provide us with suitable identification. Where permitted by law, we may charge an administration fee for granting access to your Personal Information.
- 10.2. If you become aware that Personal Information we hold about you is incorrect and you wish to access and update your information, please contact us using our contact details in **section 13** below.

## 11. Complaints

- 11.1. If you have any questions or concerns regarding CDODC's collection, handling, use or disclosure of your Personal Information, or if you believe we have not complied with this Privacy Policy or the Act, please contact us using our contact details in **section 13** below.
- 11.2. Our Privacy Officer will investigate your complaint and determine whether a breach has occurred, as well as what action, if any, we should take.
- 11.3. CDODC will take any privacy complaint seriously and will aim to respond in a timely manner. We ask that you co-operate with us during this process and provide us with any information that we may need.
- 11.4. If you remain dissatisfied following the outcome of a complaint, you can also make a formal complaint to the Officer of the Australian Information Commissioner using the details available on its [website](#).

## **12.Changes to this Privacy Policy**

- 12.1. Our Privacy Policy may change from time to time, as updated on our website. Before providing us with Personal Information, please check this Privacy Policy on our website for any changes.
- 12.2. This Privacy Policy was last updated on 3 November 2021.

## **13. Contact details**

If you wish to make a privacy complaint, comment or query, or if you would like to access and correct your Personal Information, you can contact CDODC as follows:

The Privacy Officer  
Croydon and District Obedience Dog Club  
PO Box 465, Croydon VIC 3136  
Email: [privacy@croydondogclub.com.au](mailto:privacy@croydondogclub.com.au)