

PRIVACY POLICY

INTRODUCTION

Forefront Gymnastics is committed to providing members with the highest levels of membership service. This includes protecting members' privacy. Forefront Gymnastics is bound by the 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.

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

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.

Forefront Gymnastics 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.

Forefront Gymnastics 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.

WHAT PERSONAL INFORMATION DOES FOREFRONT GYMNASTICS COLLECT?

The information collected by Forefront Gymnastics 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, working with children checks, police checks, qualifications or communication history with Forefront Gymnastics.

Sensitive Information

If it is reasonably necessary in the circumstances, Forefront Gymnastics 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 Forefront Gymnastics, you also provide consent to Forefront Gymnastics collecting it in accordance with this Privacy Policy, unless you tell us otherwise.

HOW FOREFRONT GYMNASTICS COLLECTS PERSONAL INFORMATION

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

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

Personal information may also be collected where Forefront Gymnastics 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).

Providing information

If you do not provide some or all of the information that we request from you, this may affect Forefront Gymnastics 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 Forefront Gymnastics. If it is impracticable for Forefront Gymnastics to deal with you as a result of you not providing the requested information or consent, Forefront Gymnastics may refuse to do so.

Collection from third parties

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

In some circumstances, Forefront Gymnastics collects information from schools, gymnastic clubs or other third parties.

Examples of such third parties could include, without limitation, Gymnastics WA.

Information storage and protection

Forefront Gymnastics stores personal information on a computer database. The personal information may be held in both paper file and computer file form. Forefront Gymnastics 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 Forefront Gymnastics and/or GA membership database. When your information is entered into Forefront Gymnastics and/or GA membership database, the information may be combined or linked with other information held about you.

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

HOW FOREFRONT GYMNASTICS USES PERSONAL INFORMATION

Forefront Gymnastics, 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 Forefront Gymnastics 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.

Forefront Gymnastics 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, or to plan events and activities.

If Forefront Gymnastics 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 Forefront Gymnastics accordingly by writing to Forefront Gymnastics Membership Administrator.

WHEN WE DISCLOSE PERSONAL INFORMATION

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

1. companies we engage to carry out functions and activities on Forefront Gymnastics behalf, including direct marketing;
2. our professional advisers, including our accountants, auditors and lawyers;
3. our insurers;
4. relevant sporting bodies such as Gymnastics Australia, various National and state sporting bodies, competition/event management companies, Federal and State Departments of Sport amongst others; and
5. in other circumstances permitted by law.

When Forefront Gymnastics provides GA with personal information about their members Forefront Gymnastics is required to make the individual aware that the information has been provided to GA 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 GA's national database.

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 Forefront Gymnastics, you may opt-out by using the link provided. Alternatively, you may advise us at any time by contacting the Forefront Gymnastics Privacy Officer via the contact details set out in this policy.

Other disclosures

In addition, Forefront Gymnastics 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.

Forefront Gymnastics website

When you visit the Forefront Gymnastics 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. Forefront Gymnastics uses this information to help analyse and improve the performance of our website.

In addition, we may use “cookies” on Forefront Gymnastics 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. Forefront Gymnastics 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.

ACCURACY OF PERSONAL INFORMATION

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

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 Forefront Gymnastics as set out below. You may also advise Forefront Gymnastics 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.

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 the Gym owner Darren Hicks as follows:

Email: club@forefrontgym.com.au

Phone: 0407 417 489

We will respond to your complaint within a reasonable period, and try to resolve your complaint for you. If we are unable to resolve your complaint or you are unhappy with the outcome, you can contact the Office of Australian Information Commissioner via its enquiries line 1300 363 992 or website <http://www.oaic.gov.au/> to lodge a complaint.

For further information on Forefront Gymnastics management of personal information, please contact Forefront Gymnastics Membership Administrator.

CHANGES TO THE POLICY

Changes to this policy may be submitted by Forefront Gymnastics for review and approval by Gymnastics WA. Once a change has been approved, the policy will be updated in the official Forefront Gymnastics policy register and circulated to all Club members via our website.

In addition, Forefront Gymnastics 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.

Disclaimer: Please note that this information is not intended to constitute legal advice, and is provided by Gymnastics Australia as general information only. You should not rely on it without first verifying the accuracy, completeness and currency of the material, its relevance to your individual circumstances and, where appropriate, obtaining specific legal advice. Gymnastics Australia does not make any warranties for the information contained herein in regard to compliance with Club 10 National Standards.