

Maccabi Privacy Policy

From time to time, Maccabi Australia and its affiliated state representative bodies may be bound to comply with the *Privacy Act 1988* (Cth) 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 is Maccabi's roof body, whose state membership organisations oversee Maccabi Club activity. Maccabi works at the grass roots level of sport through its clubs, through to national sporting events like Junior Carnival and the organisation of attendance at 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 further opportunities through collaboration and alignment and improved effectiveness across the organisation. As a membership based organisation, information is collected for the purposes of registration and communication.

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, contact details, date of birth, occupation, family background and financial records. The personal information that Maccabi holds will depend on the nature of the activity or service.

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

Maccabi may collect sensitive information when:

- providing health 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)

Exception in relation to employee records

The Principles do not apply to employee records. As a result, this statement does not apply to Maccabi's treatment of employee records, where the treatment is directly related to a current or former employment relationship between Maccabi and an employee.

If Maccabi conducts online collaboration, social media or market research, it may also ask for public opinions about its services or staff.

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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

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 email is opened or links used within an email.

If persons logs 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 will be required 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.

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.

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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. 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.

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)
- persons have expressly consented to their personal information being supplied to others for particular purposes.

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

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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: Ellana Aarons
Executive Director
Maccabi Australia
Level 1 176 Bambra Rd Caulfield South VIC 3162
Tel. +61 3 9563 5865

By email: ellana@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. Complaints will generally be handled in the first instance, by a Member Integrity Officer (MIO). Maccabi aims to respond to all complaints within a reasonable time period.

Roles and Responsibilities

The overall responsibility for the management of Maccabi privacy ultimately resides with the Maccabi Australia Executive Director. 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

National Maccabi Integrity Officer – Dr Yvonne Fayman
Email: c/- ellana@maccabi.com.au
Tel. +61 3 9563 5865

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| Version | Created By | Approved by | Date | Revision Date |
|-------------|--|-------------|-------------------|------------------|
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