#### **Australian Football Bodies Privacy Policy**

# 1 Who Are We

Your privacy is important to the Australian Football Bodies, as defined at the end of this privacy policy. This Privacy Policy provides information about the personal information that the Australian Football Bodies collect and the ways in which they may use, hold and disclose this personal information.

Each Australian Football Body will collect and use your personal information in accordance with this Privacy Policy.

When used in this document, depending on the context, "we," "our" and "us" refers to AFL and/or State Leagues and the AFL Clubs.

#### 2 AFL Football Bodies Privacy Policy

Protecting personal information is fundamental to the Australian Football Bodies' relationship with our supporters, members, players and business partners. All personal information received in connection with the Australian Football Bodies' products or services, or in the conduct of the Australian Football Bodies' business, is therefore treated seriously, having regard to the Australian Football Bodies' legal obligations.

Personal information is information that identifies you or could identify you. The AFL and AFL Clubs are subject to the Privacy Act 1988 (Cth), including the Australian Privacy Principles.

#### 3 Information Collected

Generally, the Australian Football Bodies collect personal information directly from your use of the AFL's community football administration platform provider and any registration you make to participate with or receive information from, the Australian Football Bodies and any business relationship between you and us including via email. The personal information which the Australian Football Bodies collect and hold includes:

- your name, age, billing and/or shipping address, email address, gender, occupation, telephone number(s) and your AFL Club support;
- information about dealings with the AFL and AFL Clubs, including

membership history, and subscriptions for AFL services;

- your AFL game attendance history where you purchase a ticket or use your AFL or AFL Club membership to obtain entry into a venue; and
- opinions and beliefs provided via surveys and questionnaires.

In addition, you may also provide to us and we may collect and hold additional personal information, such as:

- your credit card information; and
- details of the items ordered or purchased from us.

We also may collect additional non-personally identifiable information (for example, browser version, IP address) that will provide information regarding the general use of AFL Online.

By providing us with personal information, you consent to that information being collected, used, disclosed and stored in accordance with this Privacy Policy.

If you do not give personal information to us, it may affect our ability to provide you with products and/or services.

We may also collect information about you which is considered sensitive under applicable privacy and data protection laws. Generally, we will ask for your consent to handle your health or other sensitive information or, in certain circumstances, you will consent to our collection by providing your health or other sensitive information to us.

Where we engage with you multiple times over a short period in relation to the same matter, we may not provide you with a separate notice about privacy each time we engage with you however we will always provide you with an opportunity to opt–out of receiving communications about that matter within each of those communications.

## 4 Opt-Out/Unsubscribe

You can easily unsubscribe at any time you want to our communications by contacting us using the contact details specified in paragraph 11 of this Privacy Policy or by following the instructions contained in an email.

It may take some time to put an opt-out or an unsubscribe in effect so you may still receive communications from us for several weeks after your request is received.

For the avoidance of doubt, by opting–out or unsubscribing yourself from a mailing list of an AFL or AFL Club product or service this will ensure your removal from that particular mailing list but

will not guarantee your removal from other mailing lists that the AFL or an AFL Club may store your details in as a result of your engagement with a different service or product.

In the event that you opt-out from receiving communications from the Australian Football Bodies you will still be contacted in relation to the administration of your player registration (for example team lists, change of venue etc).

## 5 Information from Third Parties

During the course of business, the Australian Football Bodies may also collect personal information that is given to them by a third party (for example, a corporate partner of an Australian Football Body or information that is on a publicly maintained record). This information forms part of the personal information described in this policy. The Australian Football Bodies will not intentionally solicit personal information that is unintentionally disclosed.

## 6 Storage of Personal Information

Wherever reasonably practicable, the Australian Football Bodies will store personal information on data servers that are owned and controlled by the AFL and the AFL's community football administration platform provider and are located within the geographical borders of Australia. However, some of your personal information may be transferred, stored, processed, used or disclosed overseas by the Australian Football Bodies, or by the Australian Football Bodies third party service providers. In particular, as at the date this privacy policy was most recently updated, your personal information may be disclosed to recipients in the USA, Gibraltar, China and other countries from time to time.

This may happen if our service providers are located overseas, or if transactions, information, services or products have an overseas connection. Where such parties are located overseas, you may have rights to enforce such parties' compliance with applicable data protection laws, but you may not have recourse against those parties under the Australian Privacy Act in relation to how those parties treat your personal information.

You agree to the disclosure and use of such personal information in accordance with this privacy policy, and consent to its disclosure overseas and its use by third parties, including our service providers, in the USA Gibraltar, China and such other countries in which those parties or their computer systems may be located from time to time, where it may be used solely for the purposes described in this privacy policy, without us being responsible for such use (or for any breach).

## 7 Use & Disclosure of Personal Information

The Australian Football Bodies collect, hold, use and disclose your personal information for purposes including, without limitation:

- to verify your identity;
- to improve the AFL's community football administration platform provider;
- to provide, and to assist AFL Clubs with providing products and services to you, to manage and account for the products and services, and to improve the products and services;
- to manage Australian Football Bodies relationship(s) with you;
- to provide you with information about events, products and/or services that may interest you;
- to facilitate the internal business operations of the Australian Football Bodies;
- to promote and market Australian Football Bodies events, products or services;
- to enable corporate partners and sponsors of the AFL, including AFL Clubs, as well as their related bodies corporate, to market and promote their products and services to you;
- to provide to our third party service providers in connection with any of the above;
- to identify risk and implement appropriate controls to prevent or manage public health responses to pandemics or similar occurrences, including COVID-19, including by providing personal information to relevant Government and health authorities, upon request, to assist with contact tracing and take reasonable precautions to ensure the health and safety

of our employees, contractors, and others, and the security of our sites; and

• to manage any Australian Football Body, Government or health authority requirements, policies or protocols for entry into our sites and events.

The Australian Football Bodies may also disclose personal information where it is otherwise permitted to do so by law.

Where you provide your personal information directly to one Australian Football Body, although it may be disclosed to the AFL, that personal information will not ordinarily be shared with a different Australian Football Body. However, there may be some circumstances where this personal information is shared between Australian Football Bodies.

You consent to the Australian Football Bodies using your personal Information for sending you information, including promotional material, about the Australian Football Bodies, or Australian Football Bodies' products and services, as well as the products and services of third parties, now and in the future. You also consent to us sending you such information by means of direct mail, email, SMS and MMS messages. You can contact us using the contact details specified in paragraph 11 if you do not want to receive marketing information from us.

The Australian Football Bodies do not otherwise disclose personal information without your permission, unless the disclosure is:

• in accordance with this privacy policy or any agreement you enter into with up; or

with us; or

• required or authorised by law, including without limitation the Australian

Privacy Principles under the Privacy Act 1988 (Cth).

## 8 Accessing AFL Online

"AFL Online" refers to the AFL website with its top-level domain located at http://www.afl.com.au/, all related sub-domains for State Leagues and any other AFL website (including any AFL Club website) which provides an AFL and AFL Club product, AFL and AFL Club service or AFL-related product or service including related mobile applications. You need not disclose your identity to us in order to visit AFL Online, except where personal information is voluntarily supplied, however our internet server may automatically record details about any computer used to access the website (such as the IP address, domain name and browser type),

the date and time of access, and details of the information downloaded. This information is used for internal statistical purposes and to improve AFL Online.

#### Cookies

The Australian Football Bodies may use "cookies" on AFL Online. A cookie is a small text file that AFL Online may place on your computer. Usually, cookies are used as a means for our websites to remember your preferences and are thus designed to improve your experience of AFL Online. Cookies may collect and store personal information about you.

You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.

If you disable the use of cookies on your web browser or remove or reject specific cookies from our website or linked sites then you may not be able to gain access to all of the content and facilities on AFL Online.

## Website Analytics

When you visit and browse AFL Online, our website host and some third party service providers may collect information for statistical, reporting and maintenance purposes.

Subject to the terms of this Privacy Policy, this information is used to administer and improve the performance of AFL Online and will not be used to identify you. The information may include:

• the number of users visiting our website and the number of pages

viewed;

- the date, time and duration of a visit;
- visiting patterns of individuals accessing AFL Online;
- the IP address of your computer; and
- the path taken through our website.

The Australian Football Bodies use website analytic services to help analyse how you use AFL Online (Website Analytics). Website Analytics generate statistical and other information about website use by means including but not limited to cookies which are stored on users' computers. The information generated is used to create reports about the use of AFL Online. Our third party providers of these services may store this information. The Australian Football Bodies will not (and will not allow any third party to) use Website Analytics to track or to collect any personally

identifiable information of visitors to AFL Online. The Australian Football Bodies will not associate any data gathered from AFL Online with any personally identifying information from any source as part of our use of Website Analytics.

The Australian Football Bodies treat personal information that may be obtained through cookies and any other information supplied to us (for example if you send us an email) in accordance with this Privacy Policy.

# Links

AFL Online may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

# Children's Privacy

If you are under 18, you should only use AFL Online with involvement of a parent or guardian. For their protection, we ask that anyone under 18 years of age does not attempt to register with AFL Online or otherwise provide us with any personal information without the consent of a parent or legal guardian.

#### 9 Information Security

The Australian Football Bodies will take reasonable steps to protect all personal information within their direct control from misuse, interference, loss, unauthorised access, modification or disclosure. The Australian Football Bodies will take reasonable steps to hold information securely in electronic or physical form in access controlled premises or in electronic databases requiring logins and passwords.

#### 10 Notifiable Data Breaches Scheme

In the event of any loss, or unauthorised access or disclosure of your personal information that is likely to result in serious harm to you, the Australian Football Bodies will investigate and notify you and the Australian Information Commissioner as soon as practicable, in accordance with the Privacy Act 1988 (Cth).

# 11 Contacting the AFL Regarding Access & Correction and Privacy Complaints

The privacy laws of some jurisdictions give individuals the right to access, amend or delete their personal information or, in some circumstances, to restrict or object to the processing of their personal information.

Information we hold about you should be up-to-date and accurate. Please advise of any changes to your information using the contact details set out in this paragraph 11.

An individual may:

• request access to and seek the correction of their personal information

held by the Australian Football Bodies at any time;

- make a complaint in relation to an alleged breach of privacy; or
- submit a query or concern about this Privacy Policy or an Australian

Football Bodies' information handling processes,

by contacting the AFL's Privacy Officer by email at privacy.officer@afl.com.au or in writing to the AFL via AFL Privacy Officer, AFL House, 140 Harbour Esplanade, Docklands, Victoria 3008 or telephone on 03 9643 1999.

# Access

You will be required to provide proof of identity in order to obtain access to your personal information. If you would like to request a copy of your data, or would like to take steps to exercise your rights, please contact us as set out in this paragraph 11. The Australian Football Bodies may charge an administration fee where access is provided. The Australian Football Bodies may refuse to provide access if permitted to do so by law. The Australian Football Bodies aim to provide access to your personal information within 30 days of a valid request.

# Complaints

At all times, privacy complaints:

- will be treated seriously;
- will be dealt with promptly;
- will be dealt with in a confidential manner; and
- will not affect your existing obligations or affect the commercial

arrangements between you and the Australian Football Body.

The AFL's Privacy Officer will commence an investigation into your complaint. You will be informed of the outcome of your complaint within a reasonable period of time following completion of the investigation.

## 12 Australian Football Bodies

For the purpose of this policy, "Australian Football Bodies" means all Australian football clubs and leagues affiliated with the AFL or AFL State Bodies, that being:

- Australian Football League ACN 004 155 211
- AFL (NSW/ACT) Commission Ltd ACN 086 839 385;
- AFL Northern Territory Ltd ACN 097 620 525;
- AFL Queensland Limited ACN 090 629 342;
- South Australian National Football League Inc ABN 59 518 757 737;
- Football Tasmania Limited ACN 085 213 350;
- Australian Football League (Victoria) ACN 147 664 579;
- West Australian Football Commission Inc ABN 51 167 923 136;
- Adelaide Football Club Limited ACN 008 101 568;
- Brisbane Bears Fitzroy Football Club Limited t/a Brisbane Lions Australian Football Club ACN 054 263 473;
- Carlton Football Club Limited ACN 005 449 909;
- Collingwood Football Club Limited ACN 006 211 196;
- Essendon Football Club ACN 004 286 373;
- Footscray Football Club Limited t/a Western Bulldogs ACN 005 226 595;
- Fremantle Football Club Limited ACN 066 055 249;
- Geelong Football Club Limited ACN 005 150 818;
- GCFC Limited ACN 144 555 822;

- Hawthorn Football Club Limited ACN 005 068 851;
- Melbourne Football Club Limited ACN 005 686 902;
- North Melbourne Football Club Limited ACN 006 468 962;
- Port Adelaide Football Club Limited ACN 068 839 547;
- Richmond Football Club Limited ACN 065 563 011;
- St Kilda Saints Football Club Limited ACN 005 174 836;
- Sydney Swans Limited ACN 063 349 708;
- West Coast Eagles a division of Indian Pacific Ltd ACN 009 178 894;
- Western Sydney Football Club Limited ACN 130 190 242;
- An entity or body that is affiliated with (or licensed by) an Affiliated State or Territory Body.

#### **13 Updates to Privacy Policy**

We may vary this Privacy Policy from time to time, by posting an updated Privacy Policy accessible via <u>www.play.afl/clubhelp</u>. This Privacy Policy was last updated in February 2022.