

OWIA Privacy Policy

Version 3

1. POLICY OBJECTIVE

The Olympic Winter Institute of Australia Limited (ABN 97 083 236 659) of O'Brien Icehouse Level 2, 105 Pearl River Road, Docklands, VIC 3008 Australia (the **OWIA**) is responsible for developing and preparing elite Australian athletes for their participation in Olympic Winter Games, World Championships and World Cup events. This Privacy Policy (the **Policy**) sets out the way in which the OWIA collects, uses and discloses personal information and also explains your rights and how to contact the OWIA. The OWIA is committed to protecting your personal information in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**). Please read the text carefully.

2. THE POLICY APPLIES TO

This policy applies to all individuals from whom personal information is collected, held and used by the OWIA.

3. YOUR PERSONAL INFORMATION

- 3.1 In the course of its operations, the OWIA may collect, use and disclose the personal information of athletes, administrators, participants and other individuals for the purpose of facilitating the inclusion of athletes and officials into OWIA sport programs and other events. In each case, the precise nature of the collection, use and disclosure of personal information by the OWIA depends on the services you request and receive from, and your interaction with, the OWIA.
- 3.2 The types of personal information held by the OWIA may include your name, address, phone number, email address, date of birth, gender, occupation and social media details. Depending on the services you receive from the OWIA, the OWIA may also collect and hold details about your participation history, emergency contact information, credit card information, driver's licence details, passport details, residential address, training address, personal phone number, coach's phone number, manager or agent's phone number.
- 3.3 In certain circumstances, the OWIA may collect information about your health or other sensitive information about you (for example information about your racial or ethnic origin or information about your physical health). The OWIA may use health information about you to ensure that all programs administered by the OWIA in which you participate are run safely and in accordance with any special health needs you may have and for insurance purposes. The OWIA may also use health information as required by the OWIA's policies and by-laws, including medical and anti-doping testing and investigations.
- 3.4 In addition, the OWIA may use de-identified information or other sensitive information to carry out research, to prepare submissions to government or a government body or to plan events or activities. De-identified information is information which has been aggregated or otherwise de-identified so that it cannot be used to identify you or any other individual.
- 3.5 When you or relevant third parties provide the OWIA with personal information, this Policy will apply to the manner in which the information is collected, used, disclosed and stored by the OWIA. If you chose not to provide certain personal information, the OWIA may not be able to communicate with you. It may also affect the OWIA's ability to provide you with the products and services that you require. For example, you may not be able to receive e-newsletters if you do not provide certain personal information.



4. COLLECTING YOUR PERSONAL INFORMATION

- 4.1 Personal information may be collected by the OWIA from you or from a third party. The OWIA uses forms, online portals and other electronic or paper correspondence to collect this information.
- 4.2 For example, the OWIA may collect personal information from you: (a) via the OWIA website; (b) when you provide it to the OWIA by filling in forms approved by the OWIA from time to time; (c) when you contact the OWIA (including via email); (d) when you register for or attend a fundraising or sporting event in connection with the OWIA; (e) when you engage with the OWIA via social media or other communications platforms; (f) when it is uploaded onto any OWIA portal (including our athlete portal, the Athlete Management System (**AMS**), AUSApp, Flare or any other portal operated or used by OWIA) (**OWIA Portals**); (g) from cookies; (h) when you subscribe to receive OWIA publications, including our various newsletters; or (i) when you enter a competition that is being conducted by, or on behalf of, the OWIA.
- 4.3 The OWIA may also collect personal information about you from third parties, including: (a) a National Federation, Australian, State and Territory Institutes of Sport, Australian, State and Territory Academies of Sport, State and Territory Olympic Councils, the Australian Sports Commission, the Australian Olympic Committee, the International Olympic Committee, a sporting club, a competition administrator, a stakeholder, an anti-doping body such as the Australian Sports Anti-Doping Authority, an Organising Committee for the Olympic Games (**OCOG**), the Australian Federal Police, an Australian Government Department such as the Department of Immigration and Border Protection, the various State and Territory Government Departments responsible for conducting and processing Working With Children Checks or CrimTrack (**Olympic Administrators**); (b) your representatives; (c) OWIA corporate partners, licensees, sponsors, suppliers and broadcasters (OWIA Partners); (d) ticketing agents and event organisers; (e) vendors; and (f) the organisations listed in section 6 below.
- 4.4 In addition, when you apply for a job (employee or contractor) or volunteer position with us, we may collect certain information from you (including your name, contact details, working history and relevant records checks), from any recruitment consultant, your previous employers and others who may be able to provide information to us to assist in our decision on whether or not to make you an offer of employment or engage you under a contract. The Privacy Act contains certain exemptions in relation to certain acts undertaken in relation to employee records and related bodies corporate. Where appropriate, we make use of relevant exemptions in the Privacy Act.

5. USING YOUR PERSONAL INFORMATION

- 5.1 The OWIA may use the personal information collected about you in a variety of ways, including: (a) for historical and archival purposes; (b) to determine whether you satisfy the requirements for, and to facilitate that, inclusion in OWIA sport programs and other events under the patronage of the OWIA, the Australian Olympic Committee, the International Olympic Committee or the National Federations or International Federations governing sports on the OWIA program (including the Olympic Winter Games, World Championships and World Cup events); (c) for contact purposes when selecting athletes and officials to participate in OWIA sport programs and other events; (d) to verify your identity; (e) to ensure compliance with OWIA policies and by-laws; (f) to organise, conduct and promote Winter Olympic related activities and other events (including for the purpose of distributing publications, updating our website, providing information, making ticket offers and sending you invitations); (g) to develop programs, activities, events, products and services relating to the Winter Olympic movement; (h) to provide you with information about our services, including to send you newsletters or other communications that you have subscribed to; (i) to send alert notifications; (j) to investigate and take action in the event that applicable laws or regulations are breached, including codes of conduct; (k) to carry out market research and surveys; (l) to share with any of the Olympic Administrators; (m) to assist in investigations regarding anti-



doping, betting or gambling activities; (n) to contact you if you win a prize in a competition you have entered and to send the prize to you; and (o) any use that is reasonably apparent at the time the information is collected.

5.2 The OWIA may also use the personal information collected about you: (a) to administer, manage and improve the OWIA website, any OWIA Portal, social media or other communication platforms; (b) to ensure that content from the OWIA is presented in the most effective manner; (c) to allow you to participate in interactive features of the OWIA website, any OWIA Portal, social media or other communication platforms; (d) for direct marketing communications from the OWIA in relation to services, tickets and special offers made by our respective OWIA Partners. You will be able to opt-out of direct marketing at any time if you so choose, by contacting the OWIA Privacy Officer in accordance with section 13 below; (e) to enable the OWIA Partners to market and promote their products and services to you; and (f) any use that is reasonably apparent at the time the information is collected.

6. DISCLOSING YOUR PERSONAL INFORMATION

6.1 The OWIA may share your personal information with any Olympic Administrator or OWIA Partner with which you are connected or with whom you have expressed interest. Any Olympic Administrator or OWIA Partner may then use your personal information to facilitate activities related to the Olympic movement, including any associated activities such as anti-doping, betting or gambling, and keep you updated with information about them.

6.2 The OWIA may also share your personal information with third parties in relation to the operation of the OWIA's business, including: (a) the OWIA's employees; (b) the OWIA's related bodies corporate; (c) the OWIA's insurers; (d) the OWIA's professional advisors, including accountants, auditors and lawyers; (e) third party service providers, suppliers and partners, such as our IT hosting services, ticketing agents and OCOGs and those providers facilitating the operation of the OWIA Portals; (f) as required or authorised by law or where we have a public duty to do so, including for purposes of safety and security; and (g) where you have consented to your personal information being disclosed to others.

6.3 If you receive a product or service from, or your information is otherwise collected by, an Olympic Administrator or OWIA Partner, the relevant Olympic Administrator or OWIA Partner may have a separate privacy policy that applies to their collection, use and disclosure of your personal information. You should refer to that privacy policy for further details about how the relevant Olympic Administrator or OWIA Partner may collect, process, use, store and disclose your information and how you can contact the relevant Olympic Administrator or OWIA Partner if you have queries, or wish to make a complaint, about their handling of your personal information.

6.4 The OWIA may also disclose certain personal information in accordance with section 8.

7. STORING AND DISCLOSING YOUR PERSONAL INFORMATION ABROAD

7.1 In some circumstances the personal information that the OWIA collects may be disclosed to certain recipients, and stored at certain destinations, located outside Australia from time to time.

7.2 The OWIA will generally store personal information on data servers that are located within the geographical borders of Australia. However, your personal information may be disclosed outside of Australia if any of the OWIA's servers from time to time are located outside Australia. As at the date of this Policy, the OWIA uses servers based in the United States of America and Singapore.



- 7.3 The OWIA also provides information to OCOGs and other organisations that are located in a country outside Australia. As at the date of this Policy, this includes OCOGs and organisations in China, Japan, United States of America, Qatar, Samoa, Senegal and Switzerland.
- 7.4 The OWIA may also disclose your personal information outside of Australia in accordance with section 6 of this Policy.
- 7.5 In all cases, by providing your personal information to the OWIA or using our services, you consent to the disclosure of your personal information outside Australia as set out in this Policy, and acknowledge that the OWIA is not required to ensure that overseas recipients handle your personal information in compliance with Australian privacy law. However, the OWIA will take reasonable steps to ensure that overseas recipients use and disclose such personal information in a manner consistent with this Policy. 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 Privacy Act in relation to how those parties treat your personal information.

8. OWIA WEBSITE, OWIA PORTAL, COOKIES AND OTHER COMMUNICATION PLATFORMS

- 8.1 If you visit the OWIA website or any OWIA Portal, the OWIA, its third party service providers and certain OWIA Partners may use cookies or other technologies to record information such as your Internet Protocol address, browser type, Internet Service Provider, referring/exit pages, operating system, the pages accessed and any information downloaded.
- 8.2 A cookie is a piece of information that allows the OWIA to identify and interact more effectively with your device. You can configure your web browser software to reject cookies, however some parts of the OWIA's website, the OWIA Portals or other communication platform may not have full functionality in that case.
- 8.3 In some cases the OWIA, its third party service providers and certain OWIA Partners may use cookies and other technologies such as web beacons and JavaScript to evaluate a user's use of the OWIA's website or the OWIA Portals, deliver customised advertising content, measure the effectiveness of the advertising and provide other services relating to website activity and internet usage. The services the OWIA may use from time to time include [Google Analytics](#) and [Tag Manager](#), [Facebook Pixel and Analytics](#), [YouTube Analytics](#) and [Instagram Analytics](#). You can find more details in the privacy policies for those services, including for information on how to opt-out of certain conduct.
- 8.4 When we send you emails or other electronic messages, the OWIA may record where you open the message and click on particular links. This helps us to better understand what information is of interest to you.

9. PROTECTING YOUR PERSONAL INFORMATION

- 9.1 The OWIA takes the security of personal information seriously. The OWIA has appointed a Privacy Officer to oversee the OWIA's management of personal information in accordance with this Policy and the Privacy Act.
- 9.2 The OWIA takes reasonable steps to protect the security and privacy of your personal information. Personal information is only accessible by persons that require access to that information. The OWIA has directed its staff that personal information must be dealt with in accordance with this Policy and other data governance processes, and kept secure from unauthorised access or disclosure. The OWIA also implements technical measures to protect your personal information, including separate log-ins for OWIA personnel, two-factor authentication and remote erasure capability.



9.3 If you are considering sending us any other personal information through the OWIA website, the OWIA Portals or other communication platform, please be aware that the information may be insecure in transit, particularly where no encryption is used (e.g.: in an email). Any transmission is therefore at your own risk. Once the OWIA has received your personal information, the OWIA will take reasonable steps to protect all personal information within its direct control from unauthorised access.

9.4 Where the OWIA has given you (or where you have chosen) a password that enables you to access certain parts of any OWIA Portals or other communication platform, you are responsible for keeping that password confidential. The OWIA suggests that you do not share the password with anyone and to change it regularly.

10. ACCESS TO AND CORRECTION OF YOUR PERSONAL INFORMATION

10.1 The OWIA takes all reasonable precautions to ensure the personal information that the OWIA collects, uses and discloses is accurate, complete and up-to-date. However, the accuracy of the information depends on the information you provide. The OWIA recommends that you let us know if there are any errors in your personal information and keep us up-to-date with changes to your personal information such as your contact details.

10.2 You have the right to access the personal information we hold about you, and can request the correction of your personal data if it is inaccurate, incomplete or out of date. If you would like to do so, please contact the OWIA's Privacy Officer to submit an enquiry to access the personal information the OWIA holds about you. If we cannot provide you with access, we will provide you with reasons why.

11. OPTING OUT OF DIRECT MARKETING COMMUNICATIONS

If you wish to unsubscribe from communications the OWIA sends you, you can send an email to media@owia.org or use the opt-out function included in electronic communications.

12. CHANGES TO THIS POLICY

The OWIA may modify, alter or otherwise update this Policy at any time by publishing the new version of the Policy on the OWIA website. We will indicate any changes by updating the date of the Policy. We encourage you to check our website periodically to ensure that you are aware of our current Privacy Policy. If you have any questions about this Policy, please contact the OWIA's Privacy Officer using the details provided below.

13. CONTACTING THE OWIA'S PRIVACY OFFICE AND MAKING COMPLAINTS

13.1 You may contact the OWIA's Privacy Officer in writing at privacy@owia.org or by phone on (03) 9686 2977.

13.2 You may complain about the OWIA's collection, use or disclosure of your personal information by contacting the OWIA's Privacy Officer in writing using the contact details above with your full name and contact details, together with a detailed description of the complaint. We will respond to your complaint within a reasonable period of time and inform you of the next steps we will take in dealing with your complaint. If we are unable to resolve your complaint, we will inform you of the next steps available to you in those circumstances.

14. DOCUMENT HISTORY

Version	Adopted by OWIA Board	Content reviewed / purpose
1	20/08/14	



2	04/02/15	<ul style="list-style-type: none">▪ Letterhead updated
3	19/10/21	<ul style="list-style-type: none">▪ Extensive review and update of the OWIA Privacy Policy to address the requirements of the <i>Privacy Act 1988</i> and associated Australian Privacy Principles (APPs)