

## **AFL & AFL Club Privacy Policy**

### **1 Protecting Privacy**

Your privacy is important to the Australian Football League (AFL) and each of the 18 AFL Clubs listed in paragraph 10 at the end of this privacy policy (AFL Clubs). This privacy policy provides information about the personal information that the AFL and AFL Clubs collect and the ways in which the AFL and AFL Clubs may use, hold and disclose this personal information.

The AFL may disclose your personal information to AFL Clubs, and AFL Clubs may disclose your personal information to the AFL. Each organisation will collect and use your personal information in accordance with this privacy policy.

### **2 AFL Privacy Policy**

This policy describes the way the AFL and AFL Clubs collect, hold and disclose personal information. 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. The AFL may vary this policy from time to time, by posting an updated policy accessible via AFL Online.

Protecting personal information is fundamental to the AFL's and AFL Clubs' relationship with AFL supporters, employees and players. All personal information received in connection with an AFL or AFL Club product or service, or in the conduct of the AFL's or AFL Clubs' business, is therefore treated seriously, having regard to the AFL's and the AFL Clubs' legal obligations.

### **3 Accessing AFL Online**

"AFL Online" refers to the Australian Football League website with its top-level domain located at <http://www.afl.com.au/>, all related sub-domains 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. You need not disclose your identity to the AFL or AFL Club in order to visit AFL Online, except where personal information is voluntarily supplied, however the AFL or AFL Club 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 AFL or AFL Clubs 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 AFL or AFL Clubs 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 AFL or AFL Clubs 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 AFL or AFL Clubs will not associate any data gathered from AFL Online with any personally identifying information from any source as part of the AFL's or AFL Clubs' use of Website Analytics.

The AFL and AFL Clubs 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.

## **4 Information Collected**

Generally, the AFL and the AFL Clubs collect personal information directly from your use of the AFL's website or AFL Online and any registration you make to receive information, including via email. The personal information which the AFL and AFL Clubs collect and hold includes:

- your name, address, email address, gender, occupation, contact information and your favourite AFL Club;
- information about dealings with us 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;
- your IP address and geolocation; and
- information derived from the use of “cookies”.

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.

By providing the AFL and AFL Clubs 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 the AFL and AFL Clubs, it may affect the ability of the AFL and AFL Clubs to provide you with products and/or services.

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.

## **5 Information from Third Parties**

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

## **6 Storage of Personal Information**

Wherever reasonably practicable, the AFL and AFL Clubs will store personal information on data servers that are owned and controlled by the AFL and AFL Clubs 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 AFL or AFL Clubs, or by the AFL's or AFL Clubs' 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 AFL collects, holds, uses and discloses your personal information for purposes including, without limitation:

- to verify your identity;
- to improve AFL Online;
- 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 AFL and AFL Club's 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 AFL and the AFL Clubs;
- to promote and market AFL events, products or services;
- to enable corporate partners and sponsors of the AFL, including AFL Clubs and the AFL's digital rights partner Telstra, as well as their related bodies corporate, to market and promote their products and services to you; and
- to our third party service providers in connection with any of the above.

The AFL and AFL Clubs may also disclose personal information where it is otherwise permitted to do so by law.

Where you provide your personal information directly to one AFL Club, although it may be disclosed to the AFL, that personal information will not ordinarily be shared with a different AFL Club. However, there may be some circumstances where this personal information is shared between AFL Clubs. For example, if in a transaction you purchase merchandise relating to two AFL Clubs, that transaction may be disclosed to both AFL Clubs.

You consent to the AFL and AFL Clubs using your personal Information for sending you information, including promotional material, about the AFL or AFL Clubs, or AFL's or AFL Clubs' 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 9 if you do not want to receive marketing information from us.

The AFL and AFL Clubs 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 us; or
- required or authorised by law, including without limitation the Australian Privacy Principles under the Privacy Act 1988 (Cth).

## 8 Information Security

The AFL and AFL Clubs will take reasonable steps to protect all personal information within their direct control from misuse, interference, loss, unauthorised access, modification or disclosure. The AFL and AFL Clubs 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.

## 9 Contacting the AFL or your AFL Club Regarding Access & Correction and Privacy Complaints

An individual may:

- request access to and seek the correction of their personal information held by the AFL and AFL Clubs at any time;
- make a complaint in relation to a breach of privacy; or
- submit a query or concern about this privacy policy or the AFL or AFL Clubs' information handling processes,

by contacting the AFL at [privacy.officer@afl.com.au](mailto:privacy.officer@afl.com.au) or the relevant AFL Clubs' Privacy Officer by email at the corresponding address below:

Club	Contact
Adelaide Football Club	<a href="mailto:privacy.officer@afc.com.au">privacy.officer@afc.com.au</a>
Brisbane Lions Football Club	<a href="mailto:privacy@lions.com.au">privacy@lions.com.au</a>
Essendon Football Club	<a href="mailto:privacy.officer@essendonfc.com.au">privacy.officer@essendonfc.com.au</a>
Carlton Football Club	<a href="mailto:privacy.officer@carltonfc.com.au">privacy.officer@carltonfc.com.au</a>
Collingwood Football Club	<a href="mailto:privacy.officer@collingwoodfc.com.au">privacy.officer@collingwoodfc.com.au</a>
Fremantle Football Club	<a href="mailto:privacy.officer@fremantlefc.com.au">privacy.officer@fremantlefc.com.au</a>
Geelong Football Club	<a href="mailto:privacy.officer@geelongcats.com.au">privacy.officer@geelongcats.com.au</a>
Gold Coast Suns Football Club	<a href="mailto:privacy.officer@goldcoastfc.com.au">privacy.officer@goldcoastfc.com.au</a>
Western Sydney Football Club	<a href="mailto:privacy.officer@gwsgiants.com.au">privacy.officer@gwsgiants.com.au</a>
Hawthorn Football Club Limited	<a href="mailto:privacy.officer@hawthornfc.com.au">privacy.officer@hawthornfc.com.au</a>
Melbourne Football Club	<a href="mailto:privacy.officer@afl.com.au">privacy.officer@afl.com.au</a> .
North Melbourne Football Club	<a href="mailto:privacy.officer@nmfc.com.au">privacy.officer@nmfc.com.au</a>
Port Adelaide Football Club	<a href="mailto:privacy.officer@afl.com.au">privacy.officer@afl.com.au</a> .
Richmond Football Club	<a href="mailto:privacy.officer@richmondfc.com.au">privacy.officer@richmondfc.com.au</a>
St Kilda Saints Football Club	<a href="mailto:privacy.officer@afl.com.au">privacy.officer@afl.com.au</a> .
Sydney Swans Football Club	<a href="mailto:enquiries@sydneyswans.com.au">enquiries@sydneyswans.com.au</a>
West Coast Eagles Football Club	<a href="mailto:privacy.officer@westcoasteagles.com.au">privacy.officer@westcoasteagles.com.au</a>
Western Bulldogs Football Club	<a href="mailto:privacy.officer@westernbulldogs.com.au">privacy.officer@westernbulldogs.com.au</a>

### Access

You will be required to provide proof of identity in order to obtain access to your personal information. The AFL may charge a fee where access is provided. The AFL may refuse to provide access if permitted to do so by law. The AFL aims 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 AFL.

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.

## **10 AFL Clubs**

For the purpose of this policy, "AFL Clubs" means each of the following:

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;

Essendon Football Club ACN 004 286 373;

Carlton Football Club Limited ACN 005 449 909;

Collingwood Football Club Limited ACN 006 211 196;

Fremantle Football Club Limited ACN 066 055 249;

Geelong Football Club Limited ACN 005 150 818;

GCFC Limited ACN 144 555 822;

Western Sydney Football Club Limited ACN 130 190 242;

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; and

Footscray Football Club Limited t/a Western Bulldogs ACN 005 226 595