



SACA PRIVACY POLICY

The South Australian Cricket Association Limited (**SACA**) is committed to complying with the principles set out in the *Privacy Act 1988* (Cth) (**Privacy Act**) and the *Australian Privacy Principles*. This Privacy Policy governs our collection, storage, management, protection, use and disclosure of personal information.

By:

- using the SACA website;
- accessing, requesting, or enquiring about information relating to SACA's operations (either online or in person);
- applying for membership of SACA or any organisation, association or club administered by SACA or with which SACA is affiliated;
- entering into, or negotiating, a contract or any other form of deed or agreement with SACA; or
- providing personal information to SACA, its officers, agents or employees,

after this Privacy Policy has been brought to your attention, you acknowledge and consent to the use, collection, storage or disclosure of your personal information by us in accordance with this Privacy Policy, the *Privacy Act* and the *Australian Privacy Principles*.

In connection with this Privacy Policy and for anyone from the UK or European Union please see additional information at the *Rights under the UK Data Protection Act 2018 and General Data Protection Regulation (GDPR)* section below.

If you do not agree to us handling your personal information in the manner set out in this Privacy Policy you should cease your use of this website and not provide us with any of your personal information.

What is personal information?

We adopt the definition of personal information given in the Privacy Act:

personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not.

What kinds of personal information might we collect and hold?

We may collect (and hold) different personal information from you depending upon how you interact with us.

If you access our website, we may collect information about how you have used our website.

If you contact us, we may collect details which include, but are not limited to, your name, address, e-mail address and phone number.

We may also collect information about:

- your demographic (eg. your age, gender, vocation, educational and employment history);
- your attendance at events arranged or sponsored by SACA, and your participation in SACA activities or organisations;
- your interests;



- your views on our activities;
- our interactions, including subscriptions for SACA services or use of your Adelaide Strikers or SACA membership;
- your location;
- the technology you use to access our services;
- how and when you use our services, order or purchase our goods; and
- government identifiers, such as your driver's licence numbers.

How do we collect your personal information?

We collect personal information about you in a number of ways, including:

- directly from you, for example, when you provide information to us by phone, email, in an application form or through our websites;
- when you post about us on social media;
- when you enter a competition;
- from publicly available sources and databases (where it is unreasonable or impractical for us to collect the personal information directly from you, such as where we have provided you with a reasonable opportunity to provide personal information which we reasonably require for our activities, but you have not provided some or all of it);
- background checks, including police checks and working with children checks if you apply for employment, coaching and volunteer positions with us;
- through statutory, regulatory and other governmental processes; and
- from third parties, such as Cricket Australia and the various other state and territory cricket associations (**Other Cricket Associations**) and other third parties that we have engaged to carry out functions and activities on our behalf (including ticketing agencies).

Where possible, we collect this information from the individual concerned.

If we receive unsolicited personal information, we will assess whether we would have been entitled to collect that personal information and, if not, destroy or de-identify that personal information.

Health and sensitive information

In some circumstances we may collect:

- information about your health; or
- other sensitive information about you (for example, information about your racial or ethnic origin).

We may use health information about you to ensure that you have appropriate access and viewing facilities for events at Adelaide Oval. Further, we may use health information about you to ensure that cricket programs in which you participate are run safely and in accordance with any special health needs you may have, and for insurance purposes. We will not disclose information about your health to third parties, except as required by law or to provide goods or services that you have ordered from us.

In addition, we may use de-identified health information and other sensitive information to carry out research, to prepare submissions to government or a government body or to plan events and activities. De-identification involves the removal of any information from a record by which you may be identified.



How do we use your personal information?

We and the Other Cricket Associations, to whom we may disclose your personal information in accordance with this Privacy Policy, may use your personal information in order to:

- assess any application you make (eg. for membership), the potential to do business, or engage in an employment relationship, with you;
- manage our relationship with you;
- administer your request for tickets, process payments and deal with any permitted refunds or exchanges;
- investigate and take action in the event the ticket terms and conditions, local ground regulations or other applicable laws are breached;
- verify your identity;
- develop a members' register to enable us to maintain contact with our members;
- develop a cricketers' register to enable us to keep open lines of communication;
- develop, run, administer and market competitions, programs, activities and other events relating to cricket and other sports;
- market products, services, merchandise and special offers made available by us or Other Cricket Associations or our respective corporate partners, licensees, suppliers and sponsors;
- provide the services and/or communications you request from us;
- keep you informed of news and information (such as advance notice of ticket sales) relating to cricket and other sports, including by distributing newsletters, publications and other communications via various media;
- inform you of important event-related information, for example, time or event changes, transport information or related events;
- research and develop new competitions, programs, activities and other events relating to cricket and other sports;
- research and develop new products, services and merchandise relating to cricket and other sports;
- carry out market research and surveys;
- administer and manage our respective websites and provide you with access to those websites;
- provide you with information about our activities;
- develop and make proposals to you;
- develop community relationships;
- engage with stakeholders;
- provide you with marketing material;
- contact you in relation to our business activities;
- better understand our stakeholders, clients and customers;
- tailor our marketing, services, promotions and operations;
- understand and respect your preferences and to provide details of relevant offers and opportunities where you have agreed to receive them;
- track and analyse activity on our websites;
- perform internal business functions;
- perform corporate governance, auditing and record keeping functions;
- perform police checks and searches of court or other public records, where reasonably necessary in connection with our business activities; and
- obtain government or other approvals, such as from local councils or government departments.

Our use of personal information may extend beyond these uses, but will be restricted to purposes that we consider to be related to our functions and activities. We do not



authorise our service providers to use or disclose your personal information except as necessary to perform services on our behalf or to comply with legislation. We may also disclose your personal information to relevant law enforcement bodies for the purposes of safety and security or for the purposes of planning cricket events including, for example, traffic and transport planning purposes.

If you do not wish to receive our newsletters, publications and other communications, please contact us (our contact details are set out below).

Does SACA use my personal information for Direct Marketing?

We, Cricket Australia or any marketing agency engaged on behalf of either of us may use your personal information to communicate directly with you to promote a product or service (**Direct Marketing**). You will only receive Cricket Australia's marketing communications if you have voluntarily opted to do so. We use Direct Marketing to provide you with information about SACA products, services, events, memberships, activities, competitions, promotions or developments that we believe you may be interested in. If you receive Direct Marketing material from us, and do not wish to continue receiving it, please contact us by any of the methods set out below, asking to be removed from all future Direct Marketing programs. Once we have received your opt-out request, we will remove you from our Direct Marketing programs as soon as reasonably practicable.

Please note that for UK and EU residents, we do not send any marketing communications unless you have voluntarily opted-in to receiving them.

To whom do we disclose your personal information?

If we collect personal information from you, we may disclose it to third parties such as:

- entities we work with for the provision of our goods and services to you and other persons, including our joint venture partners and Other Cricket Associations, subject to appropriate confidentiality constraints;
- third parties who provide products or services to us (including our accountants, auditors, lawyers, IT contractors, project managers, consultants, insurers and other suppliers and service providers), subject to appropriate confidentiality constraints; or
- governmental authorities and other third parties as required by law.

Personal information that we collect directly from you in order to create and maintain our members' database will not be disclosed to third parties, except to:

- companies that we have engaged to carry out functions and activities on our behalf. For example, we disclose customer contact information to the organisations which fulfil purchase orders from our website;
- companies that have been engaged by us, Cricket Australia and/or Adelaide Oval SMA Limited to carry out functions and activities on any of our behalf in relation to products, services or activities relating to or in connection with Adelaide Oval or Australian cricket generally; and
- our professional advisers, including our accountants, auditors and lawyers; our insurers; and others as required or authorised by law.

Personal information that we collect from you for purposes other than for the maintenance of our members' database and from third parties (e.g. ticketing agencies) may be disclosed to:

- the parties referred to above;



- Cricket Australia and Other Cricket Associations;
- third parties who provide products or services to Cricket Australia or those Other Cricket Associations, subject to appropriate confidentiality constraints;
- organisations (other than State and Territory cricket associations) involved in cricket programs and initiatives in Australia; and the Australian Institute of Sport; and
- governmental bodies including the Australian, State and Territory Institutes of Sport, the Australian Sports Anti-Doping Authority, Australian Sports Commission, the Major Sporting Events Taskforce in the Australian Government's Department of Health, the Department of Immigration and Border Protection, Federal, State and Territory law enforcement and security agencies such as the Australian Security Intelligence Organisation, the Australian Federal Police, State and Territory policing organisations, contracted service providers to the Australian Government and other related entities, government departments and agencies.

Accuracy of your personal information

We take all reasonable precautions to ensure that the personal information we collect, use and 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. If you find that the personal information we hold about you is incorrect, incomplete or out-of-date, please contact us immediately (our contact details are set out below) and we will take reasonable steps to ensure that it is corrected.

If you are a SACA member or Adelaide Strikers member, you may update some of your personal information online by logging into your relevant membership account:

- SACA membership: <https://www.saca.com.au/membership/services>
- Adelaide Strikers membership: <https://www.adelaidestrikers.com.au/membership#>

How do we hold and secure your personal information?

We take reasonable steps to protect the personal information we collect from misuse, interference, loss, unauthorised access, modification or disclosure and make sure that personal information is stored securely. Those steps include storing paper records in a physically secure place, and using appropriate access controls in relation to our information systems. When personal financial information is sent to us using our website, we use encryption technologies to prevent that information from being read or altered by another person while in transit.

We maintain physical, electronic, and procedural security measures to safeguard personal information including:

- use of appropriate computer system and network security;
- where practicable, contracts with partners with which we exchange information protecting the confidentiality and integrity of personal information;
- contingency plans assessing critical system functions and establishing data backup, disaster recovery and emergency mode operations plans;
- formal, documented policies and procedures for receipt, storage, processing and distribution of information, ensuring its security;
- information access controls, including policies and procedures for access authorisation to the system and the various kinds of data it contains;
- internal information system auditing policies and procedures;
- documentation of system and data authorisations and access, documented security clearance policies and procedures, and security training for affected staff;



- documented policies and procedures for the control of the media on which information is stored, including activity tracking and data backup, storage and disposal; and
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- access controls, which may be (A) context- (ie. transaction) based, (B) role-based, or (C) user-based.

We may store your personal information in Australia or in other overseas countries, either at our premises or the premises of Cricket Australia or Other Cricket Associations, or with a third party IT services provider (which may have servers in countries other than Australia). Where possible, we will take reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles, unless the security measures applied in those countries or by those parties are equivalent to or better than the measures which we use.

Do we ever send your personal information overseas?

As part of the management of our operations, personal information may be held by SACA in Australia, as well as on servers in overseas countries owned by cloud services providers engaged by us or Cricket Australia. We may disclose your personal information to third party service providers, some of whom may be located (and so your personal information may be disclosed) overseas, including in India, the USA and the UK, and other countries from time to time.

Due to the nature of the internet, if you are visiting our website(s) your communications will inevitably result in the transfer of information across international boundaries. In particular, information obtained will be stored by our data hosting provider or that of Other Cricket Associations on dedicated servers located in multiple international jurisdictions. Our data hosting provider or that of Other Cricket Associations offers reliability and security by storing data in high-performance data centres in multiple international locations.

Please note if you are located within the UK or European Union whenever we transfer your personal information outside of the UK or European Union, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- Where possible, we will only transfer your personal information to countries that have been deemed to provide an adequate level of protection for personal information by the European Commission. For further details, see *European Commission: Adequacy of the protection of personal data in non-EU countries*.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal information the same protection it has in Europe. For further details, see *European Commission: Model contracts for the transfer of personal data to third countries*.
- Where we use providers based in the US, we may transfer personal information to them if they are part of the Privacy Shield which requires them to provide similar protection to personal information shared between Europe and the US. For further details, see *European Commission: EU-US Privacy Shield*.
- If we are going to transfer your personal information to a country which has not been deemed adequate by the European Commission, we will seek your consent for such transfer. In seeking your consent, we will provide you with information regarding:
 - the identity of the recipient (or the categories of recipient);



- the country or countries to which the personal information is to be transferred;
- why we need to make the transfer;
- the type of personal information to be transferred;
- your rights to subsequently withdraw your consent; and
- the possible risks involved in making a transfer to a country which does not provide adequate protection for personal information.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal information in this way.

If you opt into receiving marketing communications, SACA or Cricket Australia may, from time to time, utilise marketing and survey services provided by third parties located offshore, such as:

- Google Inc;
- Apple, Inc;
- Twitter, Inc;
- Facebook Inc; and
- Instagram, Inc.

Where this occurs, the disclosure will be for the purpose of marketing SACA's or Cricket Australia's products, services, events, memberships, activities, competitions, promotions or developments. In that event, you will be provided with a simple means of opting out of SACA's or Cricket Australia's marketing communications (which means will be drawn to your attention).

Your access rights

We will take reasonable steps to ensure personal information we collect and use is accurate, up-to-date and complete. Subject to some exceptions at law, you are entitled to make a request to access your personal information. We encourage you to update and correct any of your personal information that we hold.

You may request access to the personal information that we hold about you by contacting us by any of the methods as set out below (an **Access Request**). You should make any Access Request in writing. You will not be charged for lodging such a request. We will provide access by allowing you to inspect personal information, or by giving you a copy of the personal information. If your personal information is not accurate, up-to-date or complete, we will take reasonable steps to ensure that the information is corrected.

- Emailing: SACARception@saca.com.au;
- Calling us on: +618 8300 3800; or
- Writing to us at: South Australian Cricket Association, PO Box 545, North Adelaide SA 5006.

Upon receiving an Access Request we may request further details from you to verify your identity. We reserve the right not to provide you with access to personal information if we cannot verify your identity to our reasonable satisfaction.

Our website

In addition to information entered into our website, the site automatically collects two types of information.



First, we may from time to time collect information relating to use of our website, such as which pages are requested and accessed and which browser software is being used. This information enables us to identify the areas of the site which are popular and tailor the site accordingly.

Secondly, we make use of a web browser software feature known as “cookies” which causes the user’s web browser software to store small pieces of textual information on a user’s computer. A cookie helps us to recognise when you re-visit the website, and to optimise your experience. This feature allows us to make our site more useful by appearing to remember information about a user during and between visits. The cookie is stored on your machine, but does not identify you or give us any information about your computer. We do not collect any personal information from you when you use cookies on our website.

What happens if you want to deal with us anonymously or using a pseudonym, or if you otherwise provide us with incomplete personal information?

You can deal with us either anonymously or by using a pseudonym if you choose. If, however, you do so we may not be able to provide you with accurate or useful information, and (in some circumstances) you may not be able to access a full range of our goods and services. For example, we may not be able to process any membership application, provide a definitive response, assess your suitability for a position or your eligibility for certain activities or agreements, or we may need to ask you further questions and require more time to respond.

What happens if you do not provide us with personal information?

If you do not provide some or all of the personal information that we request from you, this may affect our ability to communicate with you or provide the requested products or services.

By not providing requested personal information, you may jeopardise your ability to attend events, participate in programs or competitions, or apply for employment or volunteer positions with us. If it is impractical for us to deal with you as a result of you not providing the requested personal information or consent, we may refuse to do so.

Providing personal information to us about another individual

If you provide personal information to us about any individual other than yourself, you must ensure that they understand how their information will be collected, used and disclosed as set out in this Privacy Policy and that you are authorised to disclose it to us, and to consent to its use on their behalf, before doing so.

What happens if you have a question or complaint about how we have handled your personal information?

If you have a question or complaint, you can raise it with us by:

- Emailing: SACARception@saca.com.au;
- Calling us on: +618 8300 3800; or
- Sending a letter to: South Australian Cricket Association, PO Box 545, North Adelaide SA 5006.



We take all complaints seriously and will respond to you within a reasonable period of time, unless we consider your complaint to be frivolous or vexatious.

If you aren't satisfied with the way we have handled your complaint, you can make a complaint to the Office of the Australian Information Commissioner at <http://oaic.gov.au>.

Changes to the Privacy Policy

From time to time we may need to change this Privacy Policy in line with our business practices. Changes come into effect from the time when they are brought to your attention, or when you next log onto our website, whichever is earlier. Please make sure you review this Privacy Policy each time you visit our website to keep up to date on any changes.

Rights under the UK Data Protection Act 2018 and General Data Protection Regulation (GDPR)

This section only applies to you if you are using the SACA website or interacting with SACA from the UK or European Union or otherwise benefit from rights as a data subject under the UK *Data Protection Act 2018* or the GDPR.

Please note for the purposes of this Privacy Policy SACA and Cricket Australia are the data controllers and responsible for your personal information collected in connection with this Privacy Policy.

If you wish to exercise any of the rights set out below, please contact us on the details below:

- Emailing: SACARception@saca.com.au;
- Calling us on: +618 8300 3800; or
- Writing to us at: South Australian Cricket Association, PO Box 545, North Adelaide SA 5006

If you are using the SACA website or interacting with SACA from the UK or European Union or otherwise benefit from rights as a data subject under the UK *Data Protection Act 2018* or the GDPR, you may have certain additional rights in relation to our handling of your personal information, including the following rights:

- to request access to your personal information
- to correct your personal information
- to erase your personal information;
- to restrict the processing of your personal information;
- to transfer your personal information;
- to object to the processing of personal information;
- to withdraw consent;
- to obtain a copy of personal information safeguards used for transfers outside your jurisdiction; and
- to lodge a complaint with your local supervisory authority.

No Fee Usually Required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.



What we may need from you

If you wish to access any of these rights, we may ask you for additional information to confirm your identity and for security purposes, in particular before disclosing personal information to you. We reserve the right to refuse to provide this additional information if your request is manifestly unfounded or excessive.

Time Limit to Respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Subject to legal and other permissible considerations, we will make every reasonable effort to honour your request promptly or inform you if we require further information in order to fulfil your request.

We may not always be able to address your request fully, for example if it would impact the duty of confidentiality we owe to others, or if we are legally entitled to deal with the request in a different way.

We will take steps to ensure that prior to profiling your information for a legitimate interest, that our legitimate interest is not overridden by your own interests or fundamental rights and freedoms. A legitimate interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal information for our legitimate interests. We do not use your personal information for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us. If you are a data subject with rights under the GDPR you may have rights to object to us profiling your personal information.

Right to access, correction or erasure of personal information

You have a right to request access to the personal information that we hold on you. You also have the right to request that we correct any inaccurate personal information. We may seek to verify the accuracy of the personal information before rectifying it. You can also request that we erase your personal information in limited circumstances where:

- it is no longer needed for the purposes for which it was collected; or
- you have withdrawn your consent (where the data processing was based on consent); or
- following a successful exercise of the right to object (see right to object below); or
- it has been processed unlawfully.

We are not required to comply with your request to erase personal information if the processing of your personal information is necessary:

- for compliance with a legal obligation; or
- for the establishment, exercise or defence of legal claims.

If you are a SACA member or Adelaide Strikers member, you may update some of your personal information online by logging into your relevant membership account:

- SACA membership: <https://www.saca.com.au/membership/services>
- Adelaide Strikers membership: <https://www.adelaidestrikers.com.au/membership#>



Right to restrict the processing of your personal information

You can ask us to restrict the processing of your personal information, but only where:

- its accuracy is contested, to allow us to verify its accuracy; or
- the processing is unlawful, but you do not want it erased; or
- it is no longer needed for the purposes for which it was collected, but we still need it to establish, exercise or defend legal claims; or
- you have exercised the right to object, and verification of overriding grounds is pending.

We can continue to use your personal information following a request for restriction, where:

- we have your consent; or
- to establish, exercise or defend legal claims; or
- to protect the rights of another natural or legal person.

Right to transfer your personal information

You can ask us to provide your personal information to you in a structured, commonly used, machine-readable format, or you can ask to have it transferred directly to another data controller, but in each case only where:

- the processing is based on your consent or on the performance of a contract with you; and
- the processing is carried out by automated means.

Right to object to the processing of your personal information

You can object to any processing of your personal information which has our legitimate interests as its legal basis, if you believe your fundamental rights and freedoms outweigh our legitimate interests.

If you raise an objection, we have an opportunity to demonstrate that we have compelling legitimate interests which override your rights and freedoms.

Right to withdraw consent

Where we have collected your personal information via consent, you have the right to withdraw consent at any time. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

Right to lodge a complaint with your local supervisory authority

You have a right to lodge a complaint with your local supervisory authority if you have concerns about how we are processing your personal information.

We ask that you please attempt to resolve any issues with us first, although you have a right to contact your supervisory authority at any time.



Further Information

For further information about SACA's use of personal information, or to request access to the information we might hold about you, please contact SACA by:

- Emailing: SACAREception@saca.com.au;
- Calling us on: +618 8300 3800; or
- Writing to us at: South Australian Cricket Association, PO Box 545, North Adelaide SA 5006.