

Policy – Privacy

Introduction

Croydon Chess recognises that your privacy is very important to you and that you have a right to control your personal information. We know that providing personal information is an act of trust and we take that seriously.

Croydon Chess is committed to protecting your personal information and giving you choice in who can use your personal information and how it can be used. Unless you give us explicit instructions to act otherwise, the following document states how Croydon Chess will handle your personal information and safeguard your privacy.

About Us

Croydon Chess is one of many incorporated chess clubs in Victoria and is an affiliated member of Chess Victoria. Our committee oversees the activities of the club. The list of current committee members is available at our website (www.croydonchess.com). Croydon Chess exists to:

1. Encourage the enjoyment of chess amongst residents of Croydon and surrounding suburbs
2. Educate our community about the benefits of a lifetime of playing chess
3. Train participants of all ages to become more technically proficient in their play
4. Facilitate the running of structured (competitive) chess tournaments as well as informal (casual) play
5. Provide a welcoming club environment that fosters development of productive, long-term relationships between our members

Queries

Queries concerning collection, use, disclosure and storage of your personal information should be addressed in writing to the committee:

Postal: Croydon Chess
c/- 36 The Gateway
Lilydale VIC 3140

Email: enquiries@croydonchess.com

Collection of Personal Information

Croydon Chess offers a variety of activities:

- **Casual / Informal Chess** – informal games between members and visitors
- **Tournament / Competitive Chess** – chess played as part of a tournament or other scheduled competition (e.g. interclub competition)
- **Training** – chess lessons/activities taught by experienced players

- **Social** – other activities that seek to draw people together so they feel part of our group

For each activity, regardless of its function, we generally need to collect some personal information.

Some of this information may be shared with Chess Victoria. This information helps us to:

- make the Croydon Chess club and environment more enjoyable for all the people involved
- publicise the results (e.g. tournament games) on our website
- assist Chess Victoria in determining ratings for tournament games
- send information about the activity to the club
- take appropriate action when necessary (e.g. knowing what type of first aid to offer someone if they collapse)

Generally we will only ask for your name and contact details. Where further personal information is required, it will be limited to what is necessary to fulfil the reasons presented above.

We do NOT collect information on the off chance that it may become necessary to have it some time into the future.

Whilst we may use cookies on our website, we do NOT use those cookies to collect personal information about you.

At the back of this document is a list of some of the activities run by Croydon Chess. Alongside each activity are details on the type of personal information collected, how it will be used and what happens if you do not give the information.

Children and Young Children

When Croydon Chess seeks to collect information about an individual who is 17 years or younger, it will make every effort to ensure that the parent / guardian provides express consent to information being collected.

Volunteers

Volunteers have the same rights as any individual who does not have an employee relationship with the club.

Use and Disclosure

Croydon Chess will only use your personal information for the purpose that was indicated at the time of collection, unless:

- it is required by law or by a law enforcement agency
- it is needed to lessen a serious threat to a person's health or safety
- it is in the same context as the indicated purpose (related use)
- your consent has been obtained

Sensitive information, such as medical information, will not be used for any other purpose than that stated at the time of collection, unless consent has been obtained. An example of related use is as follows:

Example 1 – Facts

John and Jenny Green's children are registered in the junior chess training program run by Croydon Chess. The parents are not formally affiliated with Croydon Chess. We have a junior presentation night and an open tournament planned and we are looking for ways of promoting them. Both the junior chess training program and presentation night can be described as a junior chess activity, whereas the open tournament is targeted predominantly at adults. It is reasonable to believe that the children's parents would not be surprised if the junior chess training program registration information were to be used for promoting the junior presentation night (a related, secondary purpose).

Example 1 – Outcome

It would be permissible for Croydon Chess to use the personal information collected from John and Jenny junior chess training program registration to promote the junior presentation night to the parents. This is because the presentation arises out of the same context as the training program. However, the training program registration should not be used to promote the open tournament, as the latter does not arise out of the same context as the junior training program.

There may be occasions where Croydon Chess will use your personal information for direct mailing purposes. If we do this, we will give you the opportunity to tell us that you do not want us to use your information for this purpose again (opt-out). When an opportunity to opt-out is given, it will be clearly stated and should involve little effort and no financial cost. An example of where an opt-out is used is as follows:

Example 2 – Facts

Same as for Example 1 – Facts (above).

Example 2 – Outcome

Croydon Chess might send information to the Greens about the open tournament provided it offered an opportunity for the parents to opt out. The opportunity to opt out would be worded in the context of what the open tournament is – an adult-focused chess tournament.

The wording for the opt-out should be stated simply, such as:

Please do not send me any more information about non-junior chess tournaments that Croydon Chess runs.

Example 3 - Facts

Tim Smith has recently moved to Croydon. On his first visit to Croydon Chess he fills out a visitors form. The form states that the information requested is used to help the club track visitor numbers and communicate upcoming activities. He therefore expects that information collected will be used for a variety of purposes. Two months after Tim first attends Croydon Chess, two things have occurred:

- 1. Tim has become a member of Croydon Chess; and*
- 2. Chess Victoria decide to promote the Victorian Championship to all people attending affiliated clubs in Victoria*

Example 3 - Outcome

It would be reasonable for Chess Victoria to use an opt-out clause to promote their activities to the people who are members of Croydon Chess. The potential consequences are not too significant for the members, as their membership makes them aware and generally supportive of the mission of Chess Victoria.

Even though Chess Victoria could use an opt-out clause to promote the Victorian Championship to the junior chess training program parents, it might be unwise to do so. The contact is out of context.

Data Quality

Croydon Chess will use its best endeavours to ensure that your personal information it collects from you is relevant, accurate, complete and up to date for the purpose for which it is to be used, both at the time we collect and use it.

At the time of first collecting the information we will assume that it is accurate, complete and up to date, unless there is other information to suggest that it is not.

Croydon Chess does not routinely seek to update personal information, unless it is necessary for the purpose for which it is to be used.

Data Security

Croydon Chess always seeks to take reasonable steps to protect the personal information it holds about you from misuse and unauthorised access, modification and disclosure.

Paper records are normally kept in a lockable filing cabinet.

Electronic records are stored in a computer database that that is protected from unauthorised access by means of a username/password combination.

If personal records are no longer needed they are destroyed within a reasonable time period.

Openness

In addition to this document, any individual can access the Privacy Policy that governs Croydon Chess's treatment of personal information at www.croydonchess.com. If you require any further information, please contact our committee.

Access To Information

Croydon Chess will give you access to any personal information we hold about you upon request unless:

- it is unlawful to provide the information
- it poses a serious and imminent threat to the life or health of any individual
- it has an unreasonable impact upon the privacy of other individuals
- the request is deemed to be frivolous or vexatious

To access information we hold about you, please contact our committee.

Identifiers

Croydon Chess does not use any government identifiers (e.g. Medicare number, Tax File Number) as its own identifier.

Anonymity

Croydon Chess allows people to participate in activities anonymously wherever possible (e.g. visitors may choose to play a number of regular games of casual chess anonymously).

When this happens it is important to recognise that anonymity may limit our ability to provide services to that person (e.g. for obvious reasons we have to limit the number of times a person may visit without becoming a member)

Third-Party Data Flows

Croydon Chess will not provide information to third parties unless you have given prior consent.

Sensitive Information

Croydon Chess will not use sensitive information for any other purpose than stated at the time of collection, unless prior consent is given.

Activities

To allow members of the club to participate in tournaments and (optionally) make contact with each other we collect the following information in our database:

1. Name (first name(s) and family name)
2. Address (residential and postal)
3. Phone numbers (fixed line and/or mobile)
4. Email address
5. Birth date
6. Occupation
7. ACF ID Number and Chess Rating
8. Skills or talents (used when looking for a person to fulfil a certain role or function)
9. Other information (e.g. next of kin, medical)

This information may be used in the following ways (these are examples only):

Publication	Data Used	Accessed By	Comments
Membership List	all	Committee Members	Copies of the membership database are made available to committee members from time to time
Club News (printed, or on the club website)	1, 3, 4, 5, 7	Club members General public	People with birthdays may be noted. Committee member contact information will be published.
Tournament or Training Program (typical example)	1, 2, 3, 4, 7, 9 medical info next-of-kin info	Committee members Tournament organiser General public	Names of entrants into a tournament may be publicised on the website. Register players with Chess Victoria for rating purposes. Tournament results will be published on the website. Medical attention might be required and next-of-kin would need to be contacted.

Each activity run by Croydon Chess is likely to have a different data collection and use profile.

Definitions

Access

This involves an individual being provided access to information about themselves that is held by Croydon Chess. Giving access may include allowing an individual to inspect personal information or providing them with a copy of the information.

Collection

Croydon Chess collects personal information if it gathers, acquires or obtains personal information from any source and by any means. Collection includes situations when the club keeps personal information it has sourced “by accident” or personal information provided by an individual that has not specifically been requested.

Consent

Consent means voluntary agreement to some act, practice or purpose. It has two elements:

- knowledge of the matter agreed to; and
- voluntary agreement

Consent can be express or implied. Express consent is given explicitly, either orally or in writing. Implied consent arises where consent may reasonably be inferred in the circumstances from the conduct of the individual and Croydon Chess. Consent is invalid if there is extreme pressure or coercion.

Only a competent individual can give consent, although the club can ordinarily assume capacity unless there is something to alert it otherwise. Competence means that individuals are capable of understanding issues, forming views based on reasoned judgments and communicating their decisions. The general law about competence and incapacity will apply to the issue of consent.

Disclosure

In general terms, Croydon Chess discloses personal information when it releases information to others outside the club. It does not include giving individuals information about themselves (this is ‘access’ see above).

Employee

An employee is a person employed by Croydon Chess whose acts and practices in performing their duties of employment are those endorsed by the Croydon Chess. The application of this definition, as it relates to the Privacy Legislation, means that a committee member is an employee of the club.

Personal Information

Personal information is information or an opinion (including information or an opinion forming part of a database,) whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion. It includes all personal information regardless of its source. Personal information only relates to a natural living person.

Privacy Policy

The Privacy Policy informs an individual how personal information collected about them is used and stored. It also lets the same individual know how to access and correct information held about them.

Sensitive information

Sensitive information is a subset of personal information. It means information or opinion about an individual's racial origin, ethnic origin, political opinions, membership of a political association, religious beliefs, affiliations, philosophical beliefs, membership of a professional or trade association (including trade unions), sexual preferences or practices, criminal record or health information.

The Club

The club, as it relates to this Privacy Policy, means Croydon Chess Inc.

Use

In general terms, use of personal information refers to the handling of personal information within an organisation including the inclusion of information in any publication (printed or electronic).