

**PRIVACY POLICY** 

Brisbane Bears-Fitzroy Football Club Limited

Trading as the Brisbane Lions Australian Football Club and LIONS@springwood Privacy Policy

### 1. Protecting Privacy

Your privacy is important to the Brisbane Bears-Fitzroy Football Club Limited Trading as the Brisbane Lions Australian Football Club (BLAFC) and LIONS@springwood. This privacy policy provides information about the personal information that BLAFC collect and the ways in which BLAFC may use, hold and disclose this personal information.

### 2. Privacy Policy

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

Personal information is information that identifies you or could identify you. BLAFC are subject to the Privacy Act 1988 (Cth), including the Australian Privacy Principles. BLAFC may vary this policy from time to time.

# 3. Accessing lions.com.au

Lions.com.au refers to BLAFC website with its top-level domain located at http://www.lions.com.au/, all related sub-domains and any other website (including the lionsatspringwood.com.au website) which provides a BLAFC product, service or related product or service. You need not disclose your identity to BLAFC in order to visit lions.com.au or lionsatspringwood.com.au, except where personal information is voluntarily supplied, however BLAFC 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 lions.com.au and lionsatspringwood.com.au.

# Cookies

BLAFC may use "cookies" on its websites. A cookie is a small text file that lions.com.au 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 website experience. 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 BLAFC websites.

#### Website Analytics

When you visit and browse BLAFC websites, 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 the websites 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 the websites.
- the IP address of your computer; and
- the path taken through our website.

BLAFC use website analytic services to help analyse how you use the websites (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 BLAFC websites. Our third-party providers of these services may store this information. BLAFC 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 their websites. BLAFC will not associate any data gathered from its websites with any personally identifying information from any source as part of the use of Website Analytics.

BLAFC 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

The BLAFC websites 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 BLAFC websites 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 BLAFC websites or otherwise provide us with any personal information without the consent of a parent or legal guardian.

### 4. Information Collected

Generally, BLAFC collect personal information directly from you in your use of the products or services on offer, use of its website and any registration you make to receive information, including via email. The personal information which the BLAFC collect and hold includes:

- your name, age, address, email address, gender, occupation, contact information.
- information about dealings with us, including membership history, and subscriptions for services.
- your LIONS@springwood visitation history where you utilise your membership card in the venue.
- your AFL game attendance history where you purchase a ticket or use your 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), including that will provide information regarding the general use of BLAFC websites.

By providing BLAFC 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 BLAFC, it may affect the ability of BLAFC 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 however we will provide you with an opportunity to opt-out of receiving communications about that matter within each of these communications.

#### 5. 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 e-mail.

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 a BLAFC product or service this will ensure your removal from that particular mailing list but will not guarantee your removal from other mailing lists that BLAFC may store your details in as a result of your engagement with a different service or product.

# 6. Information from Third Parties

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

We may also receive information about you from third parties in relation to other websites. For example, you may choose to participate in a third party application or feature as part of our services (such as logging in through Facebook Connect or Google+ or otherwise linking to the services from another website or interactive service) or on a third party website or service (such as a Facebook application or a similar application or feature) through which you allow us to collect (or the third party to share) information about you, including personal information. When you choose to participate, you may be opting to link your activity on AFL Online services with that third party website or service, which may then collect information about your visits to BLAFC websites and may publish that activity as you request to your "profile" or similar feature with that third party (such as if you choose to share content you find on BLAFC websites with your "connections" on the third party's website or service).

The information we collect is subject to this Privacy Policy. However, the information collected and stored by the third party remains subject to the third party's privacy practices, including whether the third party continues to share information with us or with other third parties, the types of information shared, and your choices with regard to what is visible to others on that third party's website or service. The third



party may allow you to remove the application or feature, in which case we will no longer collect information about you through the application or feature, but we may retain the information previously collected. In addition, we may receive information about you if other users of a third party website or service give us access to their profiles and you are one of their "connections" or information about you is otherwise accessible through your "connections" web page, profile page, or similar page on a social networking or other third party website or interactive service.

### 7. Storage of Personal Information

Wherever reasonably practicable, BLAFC will store personal information on data servers that are owned and controlled by the BLAFC 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 BLAFC, or by BLAFC's 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 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 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). Where the AFL and AFL Clubs use cloud computing services, we will use our reasonable endeavours to ensure that such disclosures are in compliance with Australian privacy laws.

# 8. Use & Disclosure of Personal Information

BLAFC collects, holds, uses and discloses your personal information for purposes including, without limitation:

- to verify your identity.
- to improve its websites.
- to provide products and services to you, to manage and account for the products and services, and to improve the products and services.
- to manage its 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 BLAFC.
- to promote and market events, products or services.
- to enable corporate partners and sponsors of BLAFC to market and promote their products and services to you; and
- to our third-party service providers in connection with any of the above.

BLAFC may also disclose personal information where it is otherwise permitted to do so by law.

You consent to the BLAFC using your personal Information for sending you information, including promotional material, about BLAFC or 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, MMS messages, social media and via telephone.

### Sharing Information with Third Parties

We engage third parties to perform services in connection with the operation of our business. Examples of these services include venue management, payment processing and authorisation, fraud protection and credit risk reduction, product customisation, order fulfilment and shipping, marketing and promotional material distribution, website evaluation, data analysis and, where applicable, data cleansing.

We may need to share personal information with these third parties so that they can perform these services, however, we limit the personal information that we give to them and authorise them to use this information only for the purpose of performing those services.

We may share aggregated demographic information about our user base with our agents, including agencies or third-party vendors so that they can provide marketing analysis and consult on advertising strategies. This information does not identify individual users. We also may share non-personal information, such as the number of users who visited BLAFC websites during a specific time period or who purchased a specific product through the website, with our marketing partners, advertisers and others from time to time. This information generally is shared in an aggregated form.

The BLAFC does 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).



### 9. Information Security

BLAFC will take reasonable steps to protect all personal information within their direct control from misuse, interference, loss, unauthorised access, modification or disclosure. BLAFC 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, BLAFC will investigate and notify you and the Australian Information Commissioner as soon as practicable, in accordance with the Privacy Act 1988 (Cth).

11. Contacting BLAFC Regarding Access & Correction and Privacy Complaints An individual may:

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

by contacting the BLAFC's Privacy Officer by email at privacy@lions.com.au.

Alternatively, you may write to BLAFC via BLAFC Privacy Officer, Hyundai Centre, Level 5 812 Stanley Street Woolloongabba Qld 4102.

### Access

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

The 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



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We may vary this Privacy Policy from time to time, by posting an updated Privacy Policy accessible via the BLAFC websites. This Privacy Policy was last updated on 3 May 2018.