

## Pont3

### PRIVACY POLICY

The protection of personal information is important to Pont3. Pont3 is committed to respecting individual's privacy and the protection of personal information.

This document sets out how Pont3 may collect, hold and use personal information. By providing your personal information to Pont3, you consent to its use, storage and disclosure in accordance with this Privacy Policy.

#### **Why does Pont3 collect personal information?**

"Personal information" is information or an opinion (including information forming part of a database), whether true or not, and whether recorded in material form or not, about an individual whose identity is reasonably apparent, or can be reasonably ascertained, from the information or opinion.

Pont3 collects personal information in order to properly and efficiently carry out its functions, including registration processes for events, and to provide you requested products and services, as well as to facilitate the provision of marketing and promotion services that may be of interest to you.

Pont3 uses personal information only for the purposes for which it was provided and for directly related purposes (unless otherwise required by or authorised under law). We may state a more specific purpose at the point we collect your information.

If you do not provide us with the information that we request, we may not be able to provide you with our products or services.

#### **What personal and sensitive information does Pont3 collect?**

##### *Personal Information*

"Personal information" is information or an opinion (including information forming part of a database), whether true or not, and whether recorded in material form or not, about an individual whose identity is reasonably apparent, or can be reasonably ascertained, from the information or opinion.

The information collected by Pont3 about a particular person will vary depending on the circumstances of collection. Typically, we collect information from employees and event entrants only. The information we collect may include, but is not limited to, a person's contact details (name, email and/or postal address, phone number), date of birth, gender, credit card details, employment history, qualifications or previous communications or event history with Pont3.

##### *Sensitive Information*

If it is reasonably necessary in the circumstances, Pont3 may also collect sensitive information (which is a type of personal information) such as your medical history, nationality or disability backgrounds.

Sensitive information is afforded a higher level of privacy protection than other personal information. Where you provide sensitive information to Pont3, you also provide consent to Pont3 collecting it in accordance with this Privacy Policy, unless you tell us otherwise.

## How does Pont3 collect and hold personal information?

Information may be collected when you:

1. Register for an event or activity organised or authorised by Pont3 or other body which is a member or sponsor of Pont3 (**Affiliate**);
2. subscribe to any publication of Pont3 or an Affiliate, including electronic publications;
3. provide details to Pont3 or an Affiliate in an application, registration, consent form, survey, feedback form or incident report;
4. enter personal information into, or agree to having your personal information entered into, one of Pont3's or an Affiliate's online systems;
5. access the Pont3 website or a website of an Affiliate;
6. contact Pont3 via email, telephone or mail or engage with Pont3 via social media;
7. participate in any program, activity, competition or event run by Pont3 or an Affiliate;
8. purchase tickets to an event from Pont3 or an authorised agent;
9. purchase merchandise, products or services from Pont3 or an authorised agent or licensee;
10. are elected or appointed to the Board or a committee of Pont3; or
11. apply for employment or a volunteer position with Pont3 or an Affiliate.

Personal information may also be collected where Pont3 is required to do so by law (for education, child protection, work health and safety laws, charitable collections, medical treatment or other legislation in Australia).

### *Providing information*

If you do not provide some or all of the information that we request from you, this may affect Pont3's ability to communicate with you or provide the requested products or services.

By not providing requested information, you may jeopardise your ability to participate in events, programs or competitions or apply for employment or volunteer positions with Pont3 or an Affiliate. If it is impracticable for Pont3 to deal with you as a result of you not providing the requested information or consent, Pont3 may refuse to do so.

### *Collection from third parties*

Pont3 or an Affiliate may collect personal information regarding a child from the parent or other responsible person associated with that child.

In some circumstances, Pont3 collects information from Affiliates or other third parties. For example: a Team Captain of a team may enter competitor's personal information in bulk; or an agent may provide us with information of a professional competitor; or a tour group organiser may provide information about members of a group. In such circumstances, we will assume that the individual or organisation that provides to us the personal information has authority to do so, unless you tell us otherwise. We will use such information only for our purposes as outlined in this privacy policy. If the information is not required by us for such purposes, we will destroy it

## *Information storage and protection*

Pont3 stores information in different ways, including in paper and electronic form.

Much of the information we collect from and about entrants is added to Pont3's database. When your information is entered into Pont3's database, the information may be combined or linked with other information held about you.

Security of personal information is important to Pont3. Pont3 has taken steps to protect the information we hold from misuse, loss, unauthorised access, modification or disclosure. Some of the security measures Pont3 uses includes strict confidentiality requirements of our employees, volunteers, Affiliates and service providers, security measures for system access, and security measures for our website.

## **How does Pont3 use and disclose personal information?**

### *Use*

Pont3, and third parties to whom we may disclose personal information in accordance with this Privacy Policy, may collect, hold and use your personal information to:

1. verify your identity;
2. complete employees background checks;
3. research, develop, run, administer and market competitions, programs, activities and other events relating to running;
4. research, develop and market products, services, merchandise and special offers made available by us and third parties;
5. respond to emergency situations involving or requiring medical treatment;
6. administer, manage and provide you with access to our database or website;
7. keep you informed of news and information relating to various events, activities and opportunities via various mediums.

Pont3 does not collect any health information from entrants to events. In the event that health information is disclosed to Pont3 in the course of running an event, Pont3 shall keep that information in accordance with this policy, and may disclose it as required or authorised by law. In addition, we may use other de-identified sensitive information to carry out research, to prepare submissions to government, or to plan events and activities.

### *Disclosure*

Pont3 may disclose your personal information to a range of organisations which include, but are not limited to:

1. Affiliates and other organisations involved in athletics programs in Australia;
2. companies we engage to carry out functions and activities on Pont3's behalf, including direct marketing;
3. our professional advisers, including our accountants, auditors and lawyers;
4. our insurers;

5. relevant sporting bodies such as Athletics Australia; and
6. in other circumstances permitted by law.

In some circumstances personal information may also be disclosed outside of Australia. In such circumstances, Pont3 will use our best endeavours to ensure such parties are subject to a law, binding scheme or contract which effectively upholds principles for fair handling of the information that are suitably similar to the Australian Privacy Principles.

#### *Direct marketing*

We will use non-sensitive personal information to provide better services and for marketing purposes (including disclosure of such information to service providers).

If you do not wish to receive e-mail, SMS or posted offers from Pont3 you may opt-out by using the link provided. Alternatively, you may advise us at any time by contacting the Pont3 Privacy Officer.

#### *Other disclosures*

In addition, Pont3 may also disclose personal information:

1. with your express or implied consent;
2. when required or authorised by law;
3. to an enforcement body when reasonably necessary; or
4. to lessen or prevent a threat to an individual or public health or safety.

#### *Pont3 website*

When you visit the Pont3 website, our systems may record certain information about their use of the site, including the web pages visited and the time and date of their visit. Pont3 uses this information to help analyse and improve the performance of the Pont3 website.

In addition we may use “cookies” on the Pont3 website. Cookies are small text files that assist our website retain user preferences to improve the experience of using our website. In some cases, the cookies that we use may collect some personal information. Pont3 will treat this information in the same way as other personal information we collect. You are free to disable cookies on your internet browser to prevent this information being collected; however, you will lose the benefit of the enhanced website experience that the use of cookies may offer.

Websites linked to the Pont3 website are not subject to Pont3's privacy standards, policies or procedures. Pont3 cannot take any responsibility for the collection, use, disclosure or security of any personal information that you provide to a third party website.

#### **Accessing and seeking correction of information held by Pont3**

Pont3 will take all reasonable steps to ensure that the personal information it collects, uses or discloses is accurate, complete and up-to-date. However, we rely on the accuracy of personal information as provided to us both directly and indirectly.

We encourage you to regularly review and update your personal information. If you would like to access the personal information that we hold about you, please let us know by making a request via the contact details set out below. We will respond to your request for access

within a reasonable period. If you find that the personal information we hold about you is inaccurate, incomplete or out-of-date, please contact us immediately and we will correct it.

### **Resolving privacy issues and complaints**

Any issues or complaints in relation to the collection, use, disclosure, quality, security of and access to your personal information may be made to the Pont3 Privacy Officer at this address:

Privacy Officer  
Pont3  
Jessica Haddad  
Email: [Jessica@pont3.com](mailto:Jessica@pont3.com)  
Phone: 02 9282 0405

We will respond to your complaint within a reasonable period, and try to resolve your complaint for you. If we are unable to resolve your complaint or you are unhappy with the outcome, you can contact the Office of Australian Information Commissioner via its enquiries line 1300 363 992 or website <http://www.oaic.gov.au/> to lodge a complaint.

For further information on Pont3's management of personal information, please contact Pont3.

Pont3 may amend this Privacy Policy from time to time.

Date: 11<sup>th</sup> March 2013