

# Privacy Policy

## Introduction

Richmond Institute (“**we**” or “**us**”) is a division of Richmond Football Club Ltd ACN 005 563 011 (**Club**). Through the Club’s partnership with Swinburne University of Technology (**Swinburne**), and other industry organisations, we deliver educational programs in the sports industry to students which include work experience placements, mentoring programs and career development (**Programs**). Our mission is to provide an optimal learning environment and outstanding student experience where all students are inspired to thrive and unleash their full potential. Your privacy is also important to us. We are committed to protecting your privacy when managing your personal information. We have policies and procedures to ensure that all personal information is handled carefully and securely in accordance with the Australian Privacy Principles (**APPs**) contained in the *Privacy Act 1988* (Cth) (**Privacy Act**).

The purpose of this Privacy Policy is to tell you:

- what kind of personal information we may gather about you;
- how we may use that information and the choices you have regarding our use of such information;
- whether we disclose your personal information to anyone;
- how you may inquire, access and/or seek correction of your personal information and our access and correction handling procedure; and
- how you may alert us about an alleged breach of the APPs and our complaint handling procedure.

## Collection of information

The types of information that **we** collect from you will depend on the circumstances of collection and on the service that we are providing to you.

### *Personal information*

The type of personal information collected will be directly related to the specified purpose it has been collected for. How much of your personal information that you choose to disclose to us is completely up to you. The only way we know something about you personally is if you provide it to us. However, failure to provide certain information may result in Richmond Institute being unable to allow you to enrol or participate in the Programs or provide you with the relevant service. We will make you aware of the purpose for which we collect the personal information and, where possible, the consequences of not providing it at the time of collection.

For example:

- **Students:** We collect information about you such as your name and contact details (i.e. billing and/or postal address, phone number(s) and email address), date of birth, credit card/bank details. We may also take photographs of you. We may also collect the name and contact number of your emergency contact.
- **Placement Mentors/Supervisors/Teachers:** We collect information such as your name and contact details (i.e. phone number(s) and email address).
- **Participants:** We collect information such as your name and contact details (i.e. phone number(s), credit card/bank details, and email address).
- If you sign up to, opt in to, use or receive a particular service such as our e-newsletters and mail outs about current and future Programs, networking events or promotions we may collect information such as your date of birth and your interests and any other information required to provide that service to you (in addition to your name and contact details).
- If you participate in any surveys we, or a third party service provider acting on our behalf, may conduct from time to time on our website or via email, personal information relating to your survey responses.
- If you make an inquiry, provide feedback or make a complaint to us, we may collect your name and contact details.
- If you are applying for employment with us, we may collect any information that is relevant to such employment including:
  - your name and contact details (i.e. residential address, phone number(s) and/or email address)

- any other information relevant to the recruitment process (including any information contained in the application form and your resume).

You acknowledge that the personal information we collect from you is your own information or information which you have been authorized to provide us.

#### *Sensitive information*

Richmond Institute may collect certain sensitive information in certain circumstances including for the purpose of enrolment in the Programs. We will otherwise make you aware of the purpose for which we collect the health information and how we manage such information and the consequences of not providing it at the time of collection.

Such examples of sensitive information that we may collect includes:

- race or ethnic origin
- sexual orientation
- criminal records for the purposes of conducting a police check and Working With Children Check
- health information such as:
  - Medicare number
  - ambulance number
  - health fund number
  - information about a person's physical or mental health including conditions, disabilities, illnesses or injuries
  - medical history
  - information about prescriptions, medication and/or allergies

#### *Unsolicited information*

Where unsolicited information is received by Richmond Institute (such as through our social media platforms, we will determine, within a reasonable period of time, whether or not we would be permitted to collect the information under the APPs. If it would not be permitted for Richmond Institute to collect the information, we will destroy the information or ensure it is de-identified as soon as practicable. Otherwise, Richmond Institute may retain the information in accordance with the terms of this policy.

#### *Anonymous information*

We may also collect information about visitors to our website. For example, we may collect:

- statistical information about the number of visitors to the websites and the date, time and duration of visits
- the name of the domain/URL from which you access our website
- the internet protocol address

However, we do not collect information about the identity of the visitors unless they voluntarily provide that information.

#### **Method of collection**

This personal information will only be collected through lawful and fair means and not in an unreasonably intrusive way.

Richmond Institute collects your personal information when you deal with us directly and with your consent, including via forms or correspondence (eg by email or mail), our website(Registering your interest or enquiry), our social media pages (Facebook, Instagram, Youtube, Twitter, LinkedIn, over the phone or in person.

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Richmond Institute may also collect personal information through other organisations or people. This information is collected with your consent, except for in circumstances allowed for by legislation. Some examples of the organizations or people from which Richmond Institute may collect personal information include:

- our related bodies corporate ((i.e. Aligned Leisure Pty Ltd (**Aligned Leisure**));
- Swinburne University of Technology (who processes the enrolment applications for the Course);
- your representatives (such as a parent, coach, teacher, medical practitioner)
- your employer
- third party service providers (eg such as data relating to survey responses)
- publicly available sources of information
- current students at Richmond Institute

## **Use of information**

### *Use of personal information*

Richmond Institute will use the personal information you have chosen to provide us for the purpose for which you provided it or a related secondary purpose which you would reasonably expect. Richmond Institute will not use it for any other purpose without your consent, unless permitted or required by law.

Generally, we will use your personal information for the following purposes:

- managing your enrolment and participation in our Programs and other services
- providing the Programs or other services you have requested from Richmond Institute
- becoming a member of Richmond Institute Sports Industry Network which includes receiving information about future opportunities, programs, upcoming networking events, surveys and other information we believe would be of interest
- direct marketing of services which we believe may interest you, including information about new Programs, sports industry events, networking events, employment opportunities or promotions
- to register you for a service requested by you, such as our e-newsletters and mail outs and administering such services
- to respond to any inquiries, feedback or complaints made by you
- assisting us to improve our Programs and other services and the experience of being a student or participant;
- assisting us to improve our website or social media pages
- processing and assessing employment applications for current and future positions

### *Direct marketing*

Richmond Institute will only use your personal information for the purpose of direct marketing activities where we have obtained your consent to do so, or in circumstances where we have collected the information directly from you and you would reasonably expect that your personal information would be used or disclosed for this purpose. In addition to the marketing of our Programs or other services (as noted above), for example, with your consent, we may:

- disclose your information to our related body corporate, Aligned Leisure purpose of receiving information about future opportunities, programs, upcoming networking events, surveys and other information we believe would be of interest
- disclose your information to our partner, Swinburne for the purposes of promoting their educational products and services to you; and
- use your personal information to market products offered for sale at the retail store of the Richmond Football Club Ltd.

Richmond Institute will provide you with the opportunity to “opt out” of receiving marketing materials at the time of collection and/or at any time afterwards by either unsubscribing from the email service or contacting **our Privacy Officer** via the contact details provided below.

### *Use of anonymous information*

Richmond Institute gathers anonymous information to:

- monitor the use of our website and social media pages;
- help us make improvements to the website and social media pages; and
- offer relevant information and services to as many users as possible.

### **Disclosure**

There will be occasions where it will be necessary for Richmond Institute to disclose your personal information to third parties. Richmond Institute may disclose your personal information to:

- our related bodies corporate (including Aligned Leisure) for the purpose of receiving information about future opportunities, programs, upcoming networking events, surveys and other information we believe would be of interest;
- Mental Health First Aid Australia, Life Saving Victoria and Swinburne for the purpose of receiving information about future opportunities, programs, upcoming networking events and surveys from those organisations;
- contractors and third-party service providers on a confidential basis that we use in the ordinary course of our business to assist with the delivery of the Course or service. This includes organisations such as marketing agencies, data processing companies, printing and mailing houses and delivery companies;
- government authorities or other third parties as required by law; and/or
- any other purpose that you have consented to.

### **Transfer of information outside Australia**

Richmond Institute will not disclose your personal information to recipients outside of Australia.

### **No sale of personal information**

Under no circumstances will Richmond Institute sell or receive payment for licensing or disclosing your personal information.

### **Security**

The security of your information is important to us. Richmond Institute operates secure data networks that are designed to protect your privacy and security. When we have collected information about you it cannot be seen or modified by anyone else. Richmond Institute has implemented generally acceptable standards of technology and operational security to ensure personal information (in both physical and electronic form) is protected against loss, misuse, interference and unauthorized access.

Only authorized Richmond Institute personnel and contractors are provided access to personal information and have agreed to ensure the confidentiality of this information. Reasonable steps are taken to destroy or permanently de-identify any personal information that is no longer required. We review and update our security measures in light of current technologies. You should however be aware that the internet is not a secure environment and information sent via the internet (including email) can be guaranteed to be totally secure.

### **Data quality, access and correction**

#### *Access*

You may at any time, request access to personal information that Richmond Institute holds about you by making a request to our Privacy Officer at [rienquiries@richmondvc.com.au](mailto:rienquiries@richmondvc.com.au) or at the postal address below.

We will process any requests for access to personal information within a reasonable period of time. Where possible, we will provide you with access to that information either by providing you with copies of the

information requested or a summary of the information held. If we need to deny your request for access, we will let you know why and inform you how you may lodge a complaint regarding this decision. Generally this will only be in cases where providing access would be unlawful or is subject to a potential legal claim or proceeding.

#### *Correction*

We will try to ensure that all information we collect, use or disclose about you is accurate, complete, up-to-date and relevant to the service being provided.

Otherwise, if you discover or suspect that there is an error or information is missing, please forward your request for correction to our Privacy Officer in writing at [rienquiries@richmondvc.com.au](mailto:rienquiries@richmondvc.com.au) or at the postal address below. Our Privacy Officer at Richmond Institute will consider your request, correct your personal information and will update you by email. If your correction request is refused, our Privacy Officer or delegate will provide you within a reasonable period of time the reasons for such refusal and inform you of the complaint process (see below).

#### **Complaints about privacy and our complaint handling procedure**

If you have any complaints relating to the management of your personal information or if you believe there has been a breach of the APPs by Richmond Institute, please forward your complaint in writing to our Privacy Officer at [rienquiries@richmondvc.com.au](mailto:rienquiries@richmondvc.com.au) or at the postal address below.

Our Privacy Officer will consider the complaint and advise you of their decision in writing within a reasonable time from receipt of the complaint.

If our Privacy Officer decides that there has been a breach of the APPs, s/he will endeavour to ensure that the breach is rectified within 30 days from the date of the decision and will update you in writing. If the breach has not been rectified within 30 days, then our Privacy Officer will inform Richmond Institute's Head of Education and Training Managing Director to resolve the matter.

If you are still not satisfied after lodging a complaint with us and given us a reasonable time to respond, then we suggest that you contact the Office of the Australian Information Commissioner by:

Phone: 1300 363 992 (local call cost, but calls from mobile and pay phones may incur higher charges).  
TTY: 1800 620 241 (this number is dedicated to the hearing impaired only, no voice calls.)  
TIS: Translating and Interpreting Service: 131 450 (If you don't speak English or English is your second language and you need assistance and ask for the Office of the Australian Information Commissioner)

Post: GPO Box 2999 Canberra ACT 2601  
Fax: +61 2 9284 9666  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

#### **Contact Privacy Officer**

Please contact our Privacy Officer on the contact details below if you would like to:

- inquire about or request access and/or update your personal information; or
- report an alleged breach of your privacy rights or make a complaint;
- talk to our Privacy Officer about our Privacy Policy

Please contact:

**Post:** Privacy Officer, Richmond Institute, 446 Church St, Richmond Victoria 3121  
**Telephone:** 61+ 0473 111 109  
**E-mail:** [rienquiries@richmondvc.com.au](mailto:rienquiries@richmondvc.com.au)

## **Changes to this Privacy Policy**

Richmond Institute reserves the right to modify or amend this Privacy Policy at any time. The effective date will be displayed at the footer of the policy. To keep visitors informed, Richmond Institute will notify users of changes to our Privacy Policy by prominently identifying the alteration for a period of not less than two weeks on our website.

## **Miscellaneous**

“**personal information**” has the same meaning as in the Privacy Act.

“**sensitive information**” has the same meaning as in the Privacy Act.

“**Website**” refers to each of:

- <https://www.richmondinstitute.com.au/>
- <https://epicentre.richmondinstitute.com.au/>
- <https://rfc.lsv.com.au/>
- [https://www.instagram.com/richmond\\_institute/](https://www.instagram.com/richmond_institute/)
- <https://www.facebook.com/RichmondInstituteofSportsLeadership>
- <https://twitter.com/richmondisl?lang=en>
- <https://www.youtube.com/watch?v=LYICQ3AI5jl>

## **Further Information on Privacy**

For more information about your privacy rights in Australia, visit the Office of the Australian Commissioner’s website, [www.oaic.gov.au](http://www.oaic.gov.au)