



Sydney Seals Freediving Club General Privacy Policy

28 March 2025

This Privacy Notice is addressed to:

- the freedivers and partners with whom we create or maintain a relationship;
- our members, prospective members or partners who are natural persons;
- the representatives or contact persons of our partners who are legal entities (such as other freediving clubs, associations and federations in Australia and abroad).

When you interact with us, Sydney Seals Freediving Club Incorporated (INC25077, “**Sydney Seals**”, “**we**”, “**us**”, “**our**”) may process information about you which constitutes “**personal information**” and the Sydney Seals consider the protection of your personal information and privacy a very important matter.

Sydney Seals Freediving Club Incorporated is responsible for the processing of your personal information as it decides why and how it is processed, thereby acting as the “**controller**”.

We invite you to read this Privacy Notice carefully, which sets out in which context we are processing your personal information and explains your rights and our obligations when doing so.

Should you have any further questions in relation to the processing of your personal information, we invite you to contact sydneysealsfc@gmail.com.

1. What information do we have about you?

This information may either be directly provided by you, by our partners (e.g., the Australian Freediving Association (**AFA**)), by third parties or be obtained through trusted publicly available sources. We may collect various types of personal information about you, including but not limited to:

- your general and identification information (e.g., first name, last name, gender, email and/or postal address, fixed and/or mobile phone number, and other contact information);
- your freediving information (e.g., certifications, achievements, first aid certificates, freediving federation memberships, affiliation to other sports, volunteering or other organisations, expertise and participation in/contribution to competitions or social events, health information relating to fitness to dive and diving related incidents);
- payment information (e.g., credit card details, bank account details, or any relevant tax identification number);
- Sydney Seals and AFA member ID and profile;
- your electronic identification data where required for the purpose of delivering services to you or facilitating your participation to events and activities (e.g., login, access right, passwords, IP address, online identifiers/cookies, logs, access and connection times, image recording or sound such as badge pictures, CCTV or voice recordings);
- information regarding your preferences including in terms of channels of communication and frequency;
- data you provide to us for example when you fill in forms or during events you attend, or when you answer questions in a survey;
- data which relate to our events and activities.



2. For which purposes do we use your personal information and why is this justified?

1. *Legal basis for the processing*

We will not process your personal information if we do not have a proper justification for that purpose. Examples of the legal basis for when we may process your personal information include if:

- we have obtained your prior consent;
- the collection of the personal information is reasonably necessary for one or more of our functions or activities, and where the information is sensitive information, where we additionally have your consent;
- the information is reasonably necessary for one or more of our functions or activities;
- the collection of the information is required or authorised by or under an Australian law or a court/tribunal order;
- a permitted general situation or permitted health situation exists in relation to the collection of the information, under the *Privacy Act 1988*; or
- there are other lawful reasons for us to do so.

Please note that, when processing your personal information, we always seek to maintain a balance between our legitimate interests and your privacy.

2. *Purposes of the processing*

We always process your personal information for a specific purpose and only process the personal information that is relevant to achieve that purpose. In particular, we process your personal information for the following purposes:

- managing our relationship with you (e.g., through our databases);
- implementing tasks in preparation for or to perform freediving events and activities;
- providing you with adequate and updated information about freediving-related topics, events and activities;
- improving the quality of our interactions and services by adapting our offering to your specific needs;
- answering your requests and providing you with efficient support;
- sending you surveys (e.g., to help us improve your future interactions with us);
- inviting you to events or activities sponsored by us or our partners;
- ensuring compliance and reporting (such as complying with our policies and legal requirements, tax and deductions, managing alleged cases of misconduct or fraud; conducting audits and defending litigation);
- archiving and record keeping;
- collecting membership fees and event or activity fees; and
- any other purposes imposed by law and authorities.



3. Who has access to your personal information and to whom are they transferred?

We will not sell, share, or otherwise transfer your personal information to third parties other than those indicated in this Privacy Notice.

In the course of our activities and for the same purposes as those listed in this Privacy Notice, your personal information may be accessed by or transferred to the following categories of recipients, on a need-to-know basis to achieve such purposes:

- Sydney Seals members in the cases and manners allowed by our Constitution;
- partner freediving clubs, associations and federations in Australia and abroad;
- our independent agents or brokers (if any);
- our suppliers and services providers that provide services and products to us;
- our IT systems providers, cloud service providers, database providers and consultants;
- legal, regulatory, compliance and related bodies;
- any third party to whom we assign or novate any of our rights or obligations.

We reserve the right to disclose your information when required to by our legal, regulatory and governance obligations.

Your personal information can also be accessed by or transferred to any national and/or international regulatory, enforcement, public body or court, where we are required to do so by applicable law or regulation or at their request.

The personal information we collect from you may also be processed, accessed or stored in a country outside of Australia, which may not offer the same level of protection of personal information.

If we transfer your personal information to external entities in other jurisdictions, we will make sure to protect your personal information by (i) applying the level of protection required under the local data protection/privacy laws applicable to Australia, and (ii) acting in accordance with our policies and standards. We will take reasonable steps to ensure that any overseas recipient will deal with such personal information in a way that is consistent with the Australian Privacy Principles. You may request additional information in relation to international transfers of personal information and obtain a copy of the adequate safeguard put in place by exercising your rights as set out in Section 6 below.

4. How do we protect your personal information?

We have implemented appropriate technical and organisational measures to provide a level of security and confidentiality to your personal information.

These measures take into account:

1. the state of the art of the technology;
2. the costs of its implementation;
3. the nature of the data; and
4. the risk of the processing.

The purpose thereof is to protect it against accidental or unlawful destruction or alteration, accidental loss, unauthorised disclosure or access and other unlawful forms of processing.



When handling your personal information, we:

- only collect and process personal information which is adequate, relevant and not excessive, as required to meet the above purposes; and
- ensure that your personal information remains up-to-date and accurate.

For the latter, we may request you to confirm the personal information we hold about you is accurate. You are also invited to inform us whenever there is a change in your personal circumstances so we can ensure your personal information is kept up to date.

5. How long do we store your personal information?

We will only retain your personal information for as long as necessary to fulfil the purpose for which it was collected or to comply with legal or regulatory requirements.

6. What are your rights and how can you exercise them?

Under our Constitution, you may request that your information, other than your name, not be made available for inspection by other members.

You may further exercise the following rights under the conditions and within the limits set forth in the law:

- the right to access your personal information (including any health information) as processed by us and, if you believe that any information relating to you is incorrect, obsolete or incomplete, to request its correction or updating;
- the right to know why your personal information is being collected, how it will be used and to whom it will be disclosed;
- the option of not identifying yourself, or of using a pseudonym in certain circumstances;
- the right to stop receiving unwanted direct marketing; and
- the right to make a complaint if you think we have mishandled your personal information.

If you have a question or want to exercise the above rights you may send an email to sydneysealsfc@gmail.com.

7. How will you be informed of the changes to our Privacy Notice?

Any future changes or additions to the processing of your personal information as described in this Privacy Notice will be notified to you in advance through an individual notice through our usual communication channels (e.g., by email or via our internet website or social media).