

IGK VICTORIA PRIVACY POLICY

1. Introduction

This Privacy Policy explains how **IGK VICTORIA** (“the Club”, “we”, “our”, or “us”) collects, uses, stores, and protects your personal information and sensitive information.

Our Commitment to Your Privacy

- **Overview:** A transparent opening statement declaring that the company manages personal information in accordance with the *Privacy Act 1988* (Cth), the Australian Privacy Principles (APPs), and the "fair and reasonable" objective test for data handling. We comply with **Notifiable Data Breaches (NDB) Scheme** and if we have a data breach, we will notify the **Office of the Australian Information (OAIC) Commissioner** within 30 days.

This Privacy Policy applies to all members, students, parents/guardians, instructors, contractors, volunteers, event participants, and visitors who engage with the Club through classes, events, websites, apps, competitions, seminars, camps, retreats, or other services.

2. Definition of Personal Information

“Personal information” has the meaning given in the *Privacy Act 1988* (Cth) and includes information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in material form or not.

This may include:

- Name
- Address
- Telephone number
- Email address
- Date of birth
- Emergency contact information
- Payment and billing details
- Photographs or video recordings
- Training history and participation records
- Attendance and grading records
- Competition participation records

3.2 Sensitive Information and Health Information

Sensitive information is defined under the *Privacy Act 1988 (Cth)* and includes health information and information relating to professional or sporting associations.

As part of operating a martial arts and wellness organisation, we may collect sensitive information including:

- Medical history
- Injury records
- Allergies and allergic reactions
- Medications taken
- Physical limitations or disabilities
- Heart rate and fitness data
- Weight and body composition data
- Physical assessments
- Accessibility requirements
- Fitness and wellness goals
- Billing and payment information

This information may be collected for:

- Training safety
- Emergency response
- Event participation
- Tournament eligibility
- Camps, retreats, and seminars
- Insurance compliance
- Risk management
- Providing appropriate instruction and modifications for specific needs

Sensitive information will only be collected with your consent unless otherwise permitted or required by law.

How to Opt-Out: You have an absolute right to opt out of direct marketing at any time. You can do this by clicking the "**Unsubscribe**" link at the bottom of any marketing email, adjusting your notification preferences inside our mobile application, or emailing our Privacy Officer directly at admin@igkvic.com.au. Opt-out requests are processed free of charge and within 2-3 business days.

3.3 Information Collected from Website or Mobile App Use

If you use our website, online systems, or mobile applications, we may collect information through:

- Cookies
- Analytics tools
- Device identifiers
- Website traffic monitoring technologies

These technologies help us:

- Improve website performance
- Understand visitor behaviour
- Enhance user experience
- Secure online systems
- Recognise returning users

Cookies generally do not personally identify you, but may identify your browser, device, or internet service provider.

You may disable cookies through your browser settings, although some website functions may become unavailable.

4. How We Collect Information

We may collect personal information when you:

- Apply for membership
- Attend classes or events
- Register for seminars, camps, retreats, or tournaments
- Subscribe to newsletters or publications
- Purchase products or services
- Complete waiver or incident forms
- Use our website or mobile applications
- Contact us by phone, email, social media, or online forms
- Participate in surveys or promotional activities

Where practical, we will collect information directly from you or your parent/guardian.

5. Purpose of Collection

We collect and use personal information for purposes including:

- Managing memberships
- Delivering martial arts instruction
- Maintaining student records
- Processing payments
- Conducting grading assessments
- Managing tournaments and events
- Ensuring health and safety during training
- Emergency response and medical assistance
- Pre-existing injuries to modify classes / programs
- Allergic reactions to foods, medication, bites
- Managing insurance obligations
- Incident reporting and risk management
- Communicating with members and families
- Improving our services and programs
- Complying with legal and regulatory obligations

6. Cross-Border Data Flows

- Our data is stored on our local servers and/or processed overseas.
- We do not actively disclose your personal information to overseas recipients. However, our secure cloud storage servers or third-party IT tools may utilize global data centres located in the United States. We take extensive steps to ensure these providers comply with privacy standards equivalent to the APPs."

7. Data Retention, Minimisation, and Secure Destruction

- **Data Minimisation:** We only collect the minimum amount of identity and health data required to safely fulfill our services.
- **Retention Periods:** We retain your personal information only for as long as your account is active, or for the minimum duration required to meet our legal, financial, and statutory tax obligations (typically 7 years following contract termination).
- **Secure Destruction:** Once personal information is no longer required, we take permanent steps to securely destroy electronic records, shred hard-copy documents, or irreversibly de-identify the datasets.

6. Children and Minors

Where members are under 18 years of age, personal information may be collected from parents or legal guardians. We collect and hold data relating to children (under 18) strictly for registration, grading, insurance eligibility, and safety purposes. We require the informed consent of a parent or legal guardian before any data or medical information of a minor is processed, stored, or utilized for event participation.

Parents and guardian consent to the collection and use of the child's information for purposes reasonably necessary to:

- Deliver martial arts instruction
- Ensure student safety
- Manage participation in classes and events
- Respond to medical emergencies
- Maintain child safeguarding obligations

The Club is committed to maintaining child-safe practices and handling children's information with additional care and security.

7. Photography, Video, and Media Consent

During classes, tournaments, seminars, camps, and events, photographs and video recordings may be taken for:

- Training analysis
- Promotional material
- Social media content
- Website publication
- Educational resources
- Historical records

Where required, consent will be obtained from members or parents/guardians before identifiable images are used publicly.

You may withdraw consent for promotional use of images at any time by contacting the Club in writing.

8. Data Storage and Security

We take data security very seriously taking technical, physical, and organisational measures to protect personal information from misuse, interference, loss, unauthorised access, modification, or disclosure. We use AES-256 encryption, secure cloud architecture, multi-factor authentication and other security procedures for staff access) such as listed below.

Security measures may include:

- Encryption of digital records
- Secure cloud-based systems
- Password-protected databases
- Multi-Factor Authentication (MFA)
- Restricted staff access based on role
- Secure disposal of physical records
- Staff privacy and confidentiality training

Only authorised personnel are permitted to access personal information required for their duties.

9. Disclosure of Information

We do not sell personal information.

We may disclose personal information to trusted third parties where reasonably necessary, including:

- Payment processors
- Booking and membership platforms
- Insurance providers
- Medical personnel in emergencies
- Government or regulatory authorities
- Professional advisors
- Event organisers
- Martial Arts Governing Bodies (as members)
- IT and cybersecurity providers

Any third-party service providers engaged by the Club are expected to comply with Australian privacy obligations and only use information for authorised purposes.

For security reasons:

- We will not request credit card details over the phone.
- Membership enquiries will only be discussed with authorised persons.
- Identity verification may be required before releasing information.
- We can only discuss matters with an authorised person to a membership

10. Overseas Disclosure

Some third-party technology providers or cloud storage services may store information overseas. We utilize cloud-based management systems and payment processors, Ezidebit, which back up and host data securely either on local or on global infrastructure. Our data is primarily stored within Australia, but components may be processed in countries where these global tech infrastructure hubs reside (such as the United States). We ensure all our global providers maintain strict security protocols that align with Australian privacy standards.

11. Direct Marketing Communications

We may send newsletters, event information, promotions, and updates regarding Club activities.

You may opt out of receiving marketing communications at any time by:

- Using the unsubscribe facility in emails
- Contacting the Club directly

We will comply with applicable spam and electronic communications laws.

12. Access and Correction

You may request access to your personal information held by the Club and request corrections if information is inaccurate, incomplete, or outdated.

Requests should be submitted in writing using the contact details below.

We will require identity verification before granting access.

13. Retention of Information

We retain personal information only for as long as reasonably necessary to:

- Provide services
- Meet legal obligations
- Resolve disputes
- Maintain insurance records
- Protect the Club's legal interests

Information no longer required will be securely destroyed or de-identified where appropriate.

14. Data Breach Notification

If an eligible data breach occurs that is likely to result in serious harm, we will:

- Take immediate steps to contain the breach
- Conduct an assessment within the legally required timeframe
- Notify affected individuals where required
- Notify the Office of the Australian Information Commissioner (OAIC)

Where appropriate, specialist cybersecurity providers may be engaged to investigate and assist with remediation and recovery of data.

15. Data Quality

We take reasonable steps to ensure that personal information is accurate, complete, and up to date.

You are responsible for informing us if your details change or if any information held by us is incorrect.

16. Complaints

If you believe your privacy has been breached, you may contact us using the details on our website. If you have any questions, concerns, or complaints about how we handle your personal information, please contact our Privacy Officer directly at **(see below)**. We take all privacy complaints seriously and will investigate and respond to your query in writing within 30 days.

External Escalation: If you are unsatisfied with our internal response, you have the right to escalate your complaint directly to the federal regulator:

- **Office of the Australian Information Commission (OAIC)**
- **Website:** www.oaic.gov.au
- **Phone:** 1300 363 992

17. Contact Details

IGK Victoria, 378 Balwyn Rd, Balwyn North VIC 3104

Tel: 0418 992 298 Email: admin@igkvic.com.au Website: www.igkvic.com.au

18. Policy Updates

This Privacy Policy may be updated from time to time to reflect legal, operational, or technological changes.

The latest version will always be available through the Club's official communication channels.

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Developed for **Martial Arts Australia**

www.MartialArtsAustralia.com.au