

1. What is this policy for?

Hamilton City Gymnastics knows that our staff and members care about how their information is used and shared. We are committed to ensuring the privacy of our members and staff is protected and information is used appropriately. This policy sets out how Hamilton City Gymnastics will comply with the requirements of the [Privacy Act 2020](#)

2. Who does this policy apply to?

This policy applies to any person who is a member of or works at or with Hamilton City Gymnastics including employees, contractors, volunteers, officials, participants, casual participants, members and their families.

3. Definitions

Personal Information is "information about an identifiable individual". It covers both information that is simply about a person (e.g. eye colour) and information that may also identify them (e.g. their name). The information does not need to name the individual, as long as they are identifiable in other ways, like through their home address.

Member is any person who is registered or enrolled in any class or programme directly with Hamilton City Gymnastics. Member is extended to and includes any person for whom personal information is provided as part of membership i.e. parents/caregivers and emergency contacts.

Participant is any person whether teacher, volunteer, parent, student or class member who takes part in bookings or casual programmes who is not registered through Hamilton City Gymnastics member database.

Work includes any work or duties undertaken by a person at Hamilton City Gymnastics

Worker includes any employees, contractors, volunteers, officials, judges, coaches or any other person who has duties or work at Hamilton City Gymnastics.

4. Our Policy

4.1. Collecting Personal information

Hamilton City Gymnastics collects personal information from any person who works at, is a member of, or participates in activities, programmes or classes run by or at Hamilton City Gymnastics as needed to perform its functions, as required for reporting to Gymnastics New Zealand and/or where required by law.

Information is collected from members and participants and their caregivers to ensure we place them in the appropriate programmes and classes and have medical and contact information needed in case of an incident or event. This helps us to ensure the health and safety of all our members and participants. Information is

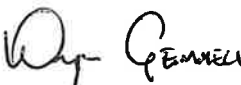
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HCG Presidents

Rachael Mitchell &



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collected when participants or members enrol in a class or programme for the first time. Where a parent/caregiver is uncomfortable providing any information asked for, they may contact the club office and we will make arrangements with that person to ensure that we can still safely provide classes for their child with limited information.

Information is collected from those who work at Hamilton City Gymnastics as needed to complete employment agreements and recruitment processes as per Individual Employment contracts. We also collect information from external agencies to ensure the health and safety of our members, and to comply with our legal obligations e.g. child safety

4.2. Storing Personal Information

Information on members is held in Friendly Manager, our membership database. Use of this database is mandated by Gymnastics New Zealand, our National Sporting Organisation as a condition of affiliation to them. Security of this system is managed by Friendly Manager. All workers that have access to the membership database must complete privacy training to ensure they understand the importance of protecting our members personal information. Permissions are set within the system to ensure that coaches, programme administrators and admin access to members personal information is limited to what is necessary to do their work.

Information on workers at Hamilton City Gymnastics is stored in our HR files which are only accessible by our Centre Manager, Programme Manager or members of the HR & REM subcommittee.

4.3. Protection of Personal Information

Hamilton City Gymnastics will maintain all reasonable protections against the loss, misuse or inappropriate disclosure of your personal information, and maintain processes to prevent unauthorised use or access to that information.

Hamilton City Gymnastics will keep all physical documents secure, both inside and outside its premises. Hamilton City Gymnastics will keep electronic personal information secure by making sure its data storage is protected from external sources, maintaining regular back up and applying good security practices. Hamilton City Gymnastics security of systems and digital management is provided externally to ensure that our cloud computing solutions meet good practice security requirements.

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4.4. Accessing Information

You have rights to access and correct your personal information (or your children's) in accordance with the Privacy Act 2020. If you want to access or correct your personal information (or your children's), please contact the Privacy Officer if you are unable to access the information through the below means. The Privacy Officer for Hamilton City Gymnastics is the Centre Manager.

All caregivers/parents have access to information on their child at all times through our member portals.

They have permissions to correct any information on file. If other information is held about their child, such as competition results, training information or testing information for example, they may request this from the programme manager.

Any workers that wish to access information on them may contact the Centre Manager.

4.5. Using Personal information

Hamilton City Gymnastics may use personal information in order to provide all activities and operations:

- to consider an employment or volunteer application;
- to amend records to remove or update personal information;
- for other everyday business purposes that involve use of personal information;
- to comply with requirements of our National Sporting Organisation (NSO) Gymnastics NZ;
- to comply with the law; or protect our rights, property, or safety, or that of our members, or others;
- to safely provide classes and perform activities.

Information will only be shared by Hamilton City Gymnastics as needed to perform its duties.

This may include but is not limited to:

- disclosing information related to health/injuries or other issues of athletes to coaches to ensure the safety of members or participants in a class or programme;
- information provided to Gymnastics New Zealand as part of our reporting requirements as a member club or to enter National events; publishing event results;
- information provided on competition entry forms to other clubs in order for a gymnast's entry to be accepted. Note that gymnast's will only be entered into competitions or events after receiving express consent;

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- as required by regulation or law.

Hamilton City Gymnastics will not disclose information about children to family/whanau unless there is a clear legal right to access that information.

4.6. Concerns or Complaints

Any questions about Hamilton City Gymnastics compliance with the Privacy Act should be referred to Hamilton City Gymnastics' Privacy Officer.

4.6 Secure Disposal of Personal Information

When personal information is no longer needed for the purposes for which it was collected, Hamilton City Gymnastics will ensure it is securely disposed of in a manner that protects the privacy of individuals. This includes:

- Shredding physical documents containing personal information.
- Permanently deleting electronic records from all storage devices and backup systems.
- Ensuring that any third-party service providers who handle data disposal on behalf of Hamilton City Gymnastics comply with secure disposal standards.

Staff files will be sealed and kept in a locked filing cabinet at the club, which is accessible only to the Centre Manager, until seven years after the staff member has resigned have passed and will then be shredded.

Membership information in the "Friendly Manager" database is controlled by Gymnastics New Zealand and falls under their Membership Data Regulation Policy.

4.7. Reporting a Breach

Breaches of this policy include breaches of any of the Privacy Principles under the Privacy Act 2020.

A notifiable privacy breach is one in which an organisation has reasonably judged that a breach it has experienced either has caused or is likely to cause someone serious harm.

If the breach is notifiable, Hamilton City Gymnastics shall inform the Office of the Privacy Commissioner, and unless an exception applies, the affected people, within 72 hours of the notifiable privacy breach.

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Individuals who wish to report an alleged breach of this policy should follow the complaints procedure outlined in the Complaints Policy and Procedures for Privacy Breaches.

5. Related Documents

- Fees policy
- Complaints Policy and Procedures
- Individual Employment Agreements
- Safeguarding Children policy
- Employee and Volunteer Relations Policy

6. Resources

- <https://www.data.govt.nz/toolkit/privacy-and-security/data-privacy/>
- <https://www.privacy.org.nz/>
- <https://sportnz.org.nz/resources/privacy-and-copyright/>
- <https://www.digital.govt.nz/standards-and-guidance/governance/managing-online-channels/security-and-privacy-for-websites/foundations/privacy-and-personal-information/>

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