

Privacy Policy

This is the Privacy Policy of Sports Advisory Partners Australia Pty Ltd, ACN 663 166 121 ("we", "us" and when relating to us, "our").

We are committed to protecting the privacy of our contacts, clients, suppliers, employees, and participants under the jurisdiction of our clients ("you" and when relating to you, "your"). We are exempt from complying with the Australian Privacy Principles set out in the *Privacy Act 1988* (Cth) (**Privacy Act**), but we nevertheless use those as guiding principles in our handling of your personal information.

In this policy we describe how we manage your personal information.

1. The kinds of personal information we collect

The kinds of personal information that we collect include:

- (a) contact details such as name, role or position, address, email address and mobile number;
- (b) information relating to your circumstances and affairs relevant to the matter(s) in which we are instructed by our clients (who may be your employer, or a sporting organisation or league or club of which you are a member or otherwise associated);
- (c) information regarding our communications with you and your attendance at seminars and promotional events held by us;
- (d) if you are an employee or prospective employee, information about your qualifications, skills and work experience; and
- (e) if you are a commercial partner or supplier or prospective commercial partner or supplier, information about your business skills, services, products and prices.

2. How we collect personal information

2.1 We collect personal information by various means including when:

- (a) you contact us with a question, complaint or enquiry, including when we act as complaint handler or investigator for one of our sporting organisation clients;
- (b) you subscribe to our newsletter or legal updates service;
- (c) you attend a seminar or event where we are hosting or presenting;
- (d) you instruct us to act for you or your employer, and we open a file and conduct a conflict check;
- (e) our clients provide information relating to related and adverse parties relevant to the advice or services we are providing;
- (f) we undertake a search or investigation; and

(g) you visit our website.

2.2 Where practicable we collect personal information about you directly from you. However, we may have collected information about you from a third party such as a client, a third party information provider, the courts, a complainant or a person responding to our questions or inquiries.

2.3 We are required to collect the full name and address of our clients by the Solicitors Rules made under the *Legal Profession Act 2004* (NSW). Accurate name and address information must also be collected in order to comply with the trust account record keeping requirements in the *Legal Profession Regulation 2005* (NSW) and to comply with our duty to the courts.

2.4 If you are a client and do not provide us with name and address information we cannot act for you.

2.5 If you do not provide us with accurate personal information we may not be able to carry out our instructions or achieve the purpose for which the information has been sought.

3. The purposes for which we collect, hold, use and disclose personal information

3.1 We collect, hold, use and personal information in order to:

- (a) respond to your enquiries;
- (b) provide legal, integrity and advisory services to our clients;
- (c) employ competent and diligent personnel;
- (d) monitor or improve the use of and satisfaction with our legal services; and
- (e) let you know about legal developments, our expertise and legal services that may be of interest to you.

3.2 We disclose personal information:

- (a) in order to carry out the instructions of our clients;
- (b) as may be required when handling complaints, investigations or disciplinary proceedings pursuant to our client sporting organisation's integrity or regulatory framework; and
- (c) subject to our confidentiality obligations, when using services in support of our legal practice.

4. The parties to whom your personal information is disclosed

4.1 Subject to our confidentiality obligations, we may share some relevant personal information with:

- (a) parties related to a matter you have with us, government authorities and service providers as reasonably required to carry out your instructions;

- (b) persons related to a matter that we have received a complaint about under our client sporting organisation's integrity framework, or that we are investigating on behalf of our client;
- (c) our e-mail marketing provider for the purposes of providing you our newsletter, invitations and legal updates; and
- (d) third party service providers who assist us with archival, auditing, accounting, legal, business consulting, website or technology services.

4.2 We also will disclose your information if required by law to do so or in circumstances permitted by the Privacy Act – for example, where we have reasonable grounds to suspect that unlawful activity, or misconduct of a serious nature, that relates to our functions or activities has been or may be engaged in, in response to a subpoena, discovery request or a court order.

5. Disclosure of information outside the jurisdiction of collection

5.1 Some of the third party service providers (e.g. video meeting platforms and cloud computing storage) or their facilities may be located overseas. Where we do so, we have first formed the reasonable belief that the overseas storage server is subject to laws substantially similar to the Australian Privacy Principles.

6. Opting out of marketing communications

6.1 We may, from time to time, send you newsletters, invitations and legal updates about our services. You can opt out of receiving further such communications by notifying us using our contact details below by clicking the "unsubscribe" option at the bottom of any marketing e-mail received from us.

7. Security

7.1 We take reasonable physical, technical and administrative safeguards to protect your personal information from misuse, interference, loss, and unauthorised access, modification and disclosure. For example, we maintain our files in secure offices and limit access to personal information to individuals with a need to know.

8. Access/correction/updating personal information

8.1 You can contact us if you would like access to your personal information. As we are exempt from the Privacy Act, we are not obliged to provide you access and will exercise our discretion on a case by case basis. We may choose to provide you with access to some or all of your information; or we may decline your request. We may charge you to provide access.

8.2 If you request to correct or update your personal information, we will correct, or, if we consider more appropriate, note your request for amendment of the information on your record.

8.3 These actions can usually be taken by contacting your SAPA client contact (if applicable), or using the contact information on the "Contact Us" section below.

9. Notification of Changes

9.1 If we decide to change our Privacy Policy, we will post our revised policy on our website.

10. Contact us

If you have any questions about this Privacy Policy and how it has been applied in relation to you, you can contact us on:

contact@sportsadvisorypartners.com.au

Attention: Privacy Officer

We will endeavour to respond to any enquiry or complaint within a reasonable time.