



1 Who Are We

Your privacy is important to the Learning and Life Centre Ltd (The Huddle) (ABN 23 159 776 020). The Huddle is a registered charity under the Australian Charities and Not-For-Profit Commission.

This Privacy Policy provides information about the personal information that The Huddle collect and the ways in which The Huddle may use, hold and disclose this personal information.

When used in this document, depending on the context, "we," "our" and "us" refers to The Huddle.

2 The Huddle Privacy Policy

Protecting personal information is fundamental to The Huddle’s relationship with our participants, employees and partners. All personal information received in connection with a Huddle product or service, or in the conduct of The Huddle’s business, is therefore treated seriously, having regard to The Huddle’s legal obligations.

Personal information is information that identifies you or could identify you. The Huddle are subject to the Privacy Act 1988 (Cth), including the Australian Privacy Principles.

3 The Huddle Privacy Policy Summarised

Personal Information	Ways we use your information				Information sharing with partners of The Huddle
	To provide service	Marketing	Fundraising	Profiling and Reporting	
Contact Information		Opt Out	Opt In		Opt Out
Demographic Information		Opt Out	Opt In		Opt Out
Health Information					
Employment Information					
Preferences and Opinions					
Financial Information			Opt In		
Attendance		Opt Out			
Online services activity			Opt In		
Cookies					

	We will collect and use your information in this way		We will not collect and use your information in this way
Opt In	By default, we will not collect and use your information in this way unless you allow us to by opting in	Opt Out	By default, we will collect and use your information in this way unless you tell us not to by opting out

You may request access to and seek the correction of your personal information held by The Huddle at any time; make a complaint in relation to an alleged breach of privacy or submit a query or concern about this Privacy Policy by contacting The Huddle by email at huddle@nmfc.com.au.



4 Information Collected

Generally, The Huddle collects personal information directly from you via your use of the products and services on offer and any registration you make to participate with or receive information from The Huddle and any business relationship between you and us, including via email. The personal information which The Huddle collect and hold includes:

- your name, age, billing and/or shipping address, email address, gender, occupation, telephone number(s), emergency contact name and telephone number(s);
- cultural background, school enrolment and allergies and medical conditions;
- information about dealings with The Huddle;
- your attendance at The Huddle program(s) and use of online services; and
- and opinions and beliefs provided via surveys and questionnaires.

In addition, you may also provide to us and we may collect and hold additional personal information, such as:

- your credit card information; and
- details of the products or services ordered or purchased from us.

We also may collect additional non-personally identifiable information (for example, browser version, IP address) that will provide information regarding the general use of online services.

By providing us with personal information, you consent to that information being collected, used, disclosed and stored in accordance with this Privacy Policy.

If you do not give personal information to us, it may affect our ability to provide you with products and/or services. Where we engage with you multiple times over a short period in relation to the same matter, we may not provide you with a separate notice about privacy each time we engage with you however we will provide you with an opportunity to opt-out of receiving communications about that matter within each of those communications.

5 Opt-Out/Unsubscribe

You can easily unsubscribe at any time you want to our communications by contacting us using the contact details specified in paragraph 12 of this Privacy Policy or by following the instructions contained in an e-mail.

It may take some time to put an opt-out or an unsubscribe in effect so you may still receive communications from us for several weeks after your request is received.

For the avoidance of doubt, by opting-out or unsubscribing yourself from a mailing list of The Huddle product or service this will ensure your removal from that particular mailing list but will not guarantee your removal from other mailing lists that The Huddle may store your details in as a result of your engagement with a different service or product.

6 Information from Third Parties

During the course of business, The Huddle may also collect personal information that is given to them by a third party (for example, a corporate partner of The Huddle or information that is on a publicly maintained record). This information forms part of the personal information described in this Privacy Policy. The Huddle will not intentionally solicit personal information that is unintentionally disclosed.

We may also receive information about you from third parties in relation to other websites. For example, you may choose to participate in a third party application or feature as part of our services (such as logging in through Facebook Connect or Google+ or otherwise linking to the services from another website or interactive service) or on a third party website or service (such as a Facebook application or a similar application or feature) through which you allow us to collect (or the third party to share) information about you, including personal information. When you



choose to participate, you may be opting to link your activity on online services with that third-party website or service, which may then collect information about your visits to online services and may publish that activity as you

request to your "profile" or similar feature with that third party (such as if you choose to share content you find on online services with your "connections" on the third party's website or service).

The information we collect is subject to this Privacy Policy. However, the information collected and stored by the third party remains subject to the third party's privacy practices, including whether the third party continues to share information with us or with other third parties, the types of information shared, and your choices with regard to what is visible to others on that third party's website or service. The third party may allow you to remove the application or feature, in which case we will no longer collect information about you through the application or feature, but we may retain the information previously collected. In addition, we may receive information about you if other users of a third party website or service give us access to their profiles and you are one of their "connections" or information about you is otherwise accessible through your "connections" web page, profile page, or similar page on a social networking or other third party website or interactive service.

7 Public Forums, Refer a Friend, and Customer Testimonials

The Huddle may provide bulletin boards, blogs or chat rooms on online services or mobile applications. Any personal information you choose to submit in such a forum may be read, collected, or used by others who visit these forums, and may be used to send you unsolicited messages. The Huddle are not responsible for the personal information you choose to submit in these forums.

8 Storage of Personal Information

Wherever reasonably practicable, The Huddle will store personal information on data servers that are owned by the North Melbourne Football Club and controlled by The Huddle and are located within the geographical borders of Australia. However, some of your personal information may be transferred, stored, processed, used or disclosed overseas by The Huddle, or by The Huddle's third-party service providers. In particular, at the date this Privacy Policy was most recently updated, your personal information may be disclosed to recipients in the USA and other countries from time to time.

This may happen if our service providers are located overseas, or if transactions, information, services or products have an overseas connection. Where such parties are located overseas, you may have rights to enforce such parties' compliance with applicable data protection laws, but you may not have recourse against those parties under the Australian Privacy Act (Cth) 1988 in relation to how those parties treat your personal information.

You agree to the disclosure and use of such personal information in accordance with this Privacy Policy, and consent to its disclosure overseas and its use by third parties, including our service providers, in the USA and such other countries in which those parties or their computer systems may be located from time to time, where it may be used solely for the purposes described in this Privacy Policy, without us being responsible for such use (or for any breach). Where The Huddle use cloud computing services we will use our reasonable endeavours to ensure that such disclosures are in compliance with Australian privacy laws.

9 Use and Disclosure of Personal Information

The Huddle collect, hold, use and disclose your personal information for purposes including, without limitation:

- to verify your identity;
- to improve online services;
- to facilitate programs and competitions;
- to provide and to assist us with providing products and services to you, to manage and account for the products and services, and to improve the products and services;
- to manage The Huddle's relationship(s) with you;



- to provide you with information about events, products and/or services that may interest you;
- to facilitate the internal business operations of The Huddle;
- to promote and market The Huddle events, products or services;
- to undertake research;
- to enable corporate partners and sponsors of The Huddle, as well as their related bodies corporate, to market and promote their products and services to you; and
- to our third-party service providers in connection with any of the above.

The Huddle may also disclose personal information where it is otherwise permitted to do so by law.

Sharing Information with Third Parties

We engage third parties to perform services in connection with the operation of our business. Examples of these services include product and services customisation, delivery of services, payment processing and authorisation, marketing and promotional material distribution, website evaluation, data analysis and, where applicable, data cleansing.

We may need to share personal information with these third parties so that they can perform these services, however, we limit the personal information that we give to them and authorise them to use this information only for the purpose of performing those services.

We may share aggregated demographic information about our user base with our agents, including agencies or third-party vendors so that they can provide marketing analysis and consult on advertising strategies. This information does not identify individual users. We also may share non-personal information, such as the number of users who visited online services during a specific time period or who purchased a specific product through the website, with our marketing partners, advertisers and others from time to time. This information generally is shared in an aggregated form.

The Huddle do not otherwise disclose personal information without your permission, unless the disclosure is:

- in accordance with this Privacy Policy or any agreement you enter into with us; or
- required or authorised by law, including without limitation the Australian Privacy Principles under the Privacy Act 1988 (Cth).

10 [Accessing online services](#)

Online services refers to, at the date this Privacy Policy was most recently updated, The Huddle website with its top-level domain located at <https://www.nmfc.com.au/huddle/>, the True North portal with its top-level domain located at <https://truenorthportal.com.au/>, the GOAL! portal with its top-level domain located at <https://www.goal.org.au/>, all related sub-domains and any other Huddle website which provides a Huddle product or service. You need not disclose your identity to The Huddle in order to visit online services, except where personal information is voluntarily supplied, however The Huddle internet server may automatically record details about any computer used to access the website (such as the IP address, domain name and browser type), the date and time of access, and details of the information downloaded. This information is used for internal statistical purposes and to improve online services.

Cookies

The Huddle may use “cookies” on online services. A cookie is a small text file that online services may place on your computer. Usually, cookies are used as a means for our websites to remember your preferences and are thus designed to improve your experience of online services. Cookies may collect and store personal information about you.

You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences.

If you disable the use of cookies on your web browser or remove or reject specific cookies from our website or linked sites then you may not be able to gain access to all of the content and facilities on online services.

Website Analytics

When you visit and browse our online services, our website host and some third-party service providers may collect information for statistical, reporting and maintenance purposes.

Subject to the terms of this Privacy Policy, this information is used to administer and improve the performance of our online services and will not be used to identify you. The information may include:

- the number of users visiting our website and the number of pages viewed;
- the date, time and duration of a visit;
- visiting patterns of individuals accessing our online services;
- the IP address of your computer; and
- the path taken through our website.

The Huddle use website analytic services to help analyse how you use our online services (Website Analytics). Website Analytics generate statistical and other information about website use by means including but not limited to cookies which are stored on users' computers. The information generated is used to create reports about the use of online services. Our third-party providers of these services may store this information. The Huddle will not (and will not allow any third party to) use Website Analytics to track or to collect any personally identifiable information of visitors to our online services. The Huddle will not associate any data gathered from online services with any personally identifying information from any source as part of The Huddle's use of Website Analytics. The Huddle treat personal information that may be obtained through cookies and any other information supplied to us (for example if you send us an email) in accordance with this Privacy Policy.

Links

Our online services may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third-party website and we are not responsible for the privacy policies or the content of any third-party website. Third party websites are responsible for informing you about their own privacy practices.

Children's Privacy

If you are under 18, you should only use our online services with involvement of a parent or guardian. For their protection, we ask that anyone under 18 years of age does not attempt to register with our online services or otherwise provide us with any personal information without the consent of a parent or legal guardian.

11 [Information Security](#)

The Huddle will take reasonable steps to protect all personal information within their direct control from misuse, interference, loss, unauthorised access, modification or disclosure. The Huddle will take reasonable steps to hold information securely in electronic or physical form in access-controlled premises or in electronic databases requiring logins and passwords.

12 [Contacting Us Regarding Access, Correction and Privacy Complaints](#)

An individual may:

- request access to and seek the correction of their personal information held by The Huddle at any time;
- make a complaint in relation to an alleged breach of privacy; or
- submit a query or concern about this Privacy Policy or The Huddle's information handling processes,

by contacting The Huddle by email at huddle@nmfc.com.au. Alternatively, you may write to The Huddle Privacy Officer, The Huddle, 204-206 Arden St, North Melbourne, Victoria 3051 or telephone on 03 9320 2400.



Access

You will be required to provide proof of identity in order to obtain access to your personal information. The Huddle may charge an administration fee where access is provided. The Huddle may refuse to provide access if permitted to do so by law. The Huddle aims to provide access to your personal information within 30 days of a valid request.

Complaints

At all times, privacy complaints:

- will be treated seriously;
- will be dealt with promptly;
- will be dealt with in a confidential manner; and
- will not affect your existing obligations or affect the commercial arrangements between you and The Huddle

The Huddle's Privacy Officer will commence an investigation into your complaint. You will be informed of the outcome of your complaint within a reasonable period of time following completion of the investigation.

13 [Updates to Privacy Policy](#)

We may vary this Privacy Policy from time to time, by posting an updated Privacy Policy accessible via The Huddle website. This Privacy Policy was last updated on 28 April 2020.