



Melbourne Cricket Club Privacy Policy

Last updated: October 2023

The Melbourne Cricket Club (MCC) is bound to comply with the Information Privacy Principles contained in the Victorian Privacy and Data Protection Act 2014 (Vic) (Privacy Act), and to the extent it deals with health information, the Victorian Health Records Act 2001 (Vic) (Health Records Act) (together the Privacy Laws). This Privacy Policy provides you with details of what personal information may be held about you by the Melbourne Cricket Club, how you can access this information and the purposes for which that personal information is collected, held, used and disclosed.

In this Privacy Policy, the terms **we**, **us** and **our** are a reference to the MCC and the terms personal information, sensitive information and health information have the meaning given in schedule 1. This Privacy Policy applies to the MCC, including its role in relation to the MCG and the Australian Sports Museum, and applies to the MCC's Special Interest Groups and Sporting Sections in accordance with section 9 (Special Interest Groups and Sporting Sections).

1. **COLLECTION OF PERSONAL INFORMATION**

The MCC collects personal information about Patrons, Members, Waiting List Candidates and its Staff, as well as representatives of its Suppliers, Key Stakeholders, Venue Hirers, representatives and participants in Special Interest Groups, Sporting Sections, and other users of MCC facilities, including the MCG, Yarra Park, Australian Sports Museum, Albert Ground and any other facilities that the MCC may manage from time to time, for the purposes set out under section 2 (Use and Disclosure of Personal Information).

The type of information we collect will depend on the particular purposes and will only be collected where that information is necessary for the MCC to perform its functions or activities. Such information may include (but is not limited to) name, age, gender, date of birth, address, phone number, email address, team of support, nationality, relationship status, number of children, membership status, interests and profession, personal information in relation to the MCC's Staff employment (eg engagement, training and disciplining of an employee, personal and emergency contact details, insurance details, employment history, health details) for employment purposes, as well as applicable transactional information and images and video footage of you, including images and video footage collected for promotional purposes or using security cameras for security or operational purposes, including facial recognition technology and body worn cameras used by our security officers. For more information, see section 8 (Surveillance Activities) below.

We may collect personal information through a variety of means, including (but not limited to) nominating for or becoming a Member, providing and updating your details online or through a paper form, attending an event hosted by the MCC, attending or registering for an event, by technology used at the MCG or any other facilities that the MCC may own, operate or manage from time to time (including surveillance activities as set out in section 8 below), entering a competition run by the MCC, using a membership card, during recruitment of potential Staff members and in the course of employment for Staff members, involvement with a Special Interest Group or Sporting Section,



subscribing to receive regular newsletters from the MCC or if you contact us directly via social media, phone or email, or where information is shared with us by a third party including our Key Stakeholders. We may advise you of other means of collecting information through public notices available at the MCG or any other facilities that the MCC may own, or terms and conditions provided to you including the Conditions of Entry to the MCG.

We may also collect other information through your use of MCC digital services and technology made available to you, including the MCG WiFi network or mobile applications, such as the device ID number (MAC address) and IP address of any device used by you when accessing those services, as well as location, identifiers, usage data and diagnostics. If we hold such information that can be associated to you or the device you are using, then that information may be linked with your personal information, and will be treated in the same manner as the personal information to which it has been linked.

Where lawful and practicable, you have the option to not identify yourself when entering into a transaction with the MCC. However, some of our services require your personal information, and where you are a Member certain activities may be linked to your membership. If you do not wish to provide the information requested, we may not be able to provide you with those services, or the quality of the services may be impacted.

We consider it is the responsibility of parents to monitor their children's use of our websites and services (such as the MCG WiFi network and MCC-owned websites). Nevertheless it is our policy not to require personal information from persons known to be under the age of 18 years or offer to send any promotional material to persons in that category, unless parental permission to such use of personal information has been granted (for children aged six years and older, this includes nomination of the child as a Waiting List Candidate), or those persons are Members or Waiting List Candidates aged 15-17 years.

2. **USE AND DISCLOSURE OF PERSONAL INFORMATION**

We will not use or disclose personal information (including sensitive information or health information) for purposes other than those connected with the primary purpose of collection, a related secondary purpose (and for any sensitive information, directly related) which we believe you should reasonably expect or where we are otherwise required or permitted under the Privacy Laws or other applicable law.

The MCC collects, uses and discloses personal information (including sensitive information and health information) for the primary purpose of providing entertainment and also to provide related services and any other activity or purpose consistent with the *Melbourne Cricket Club Act 1974 (Vic)* and the MCC's constitution, including:

- (a) to maintain the security of our facilities, including managing entry to our facilities, queue management, monitoring people movement and general operational purposes, minimising and detecting unlawful activity or serious threats to safety, resolving complaints, preventing crowd disturbances, investigating disciplinary actions and allegations and to assist law enforcement, Key Stakeholders and certain Suppliers (such as the MCC's security contractors) in carrying out their responsibilities, such as responsibilities that apply under the *Major Sporting Events Act 2009 (Vic)* and other applicable law or as part of their investigations of inappropriate or unlawful conduct;



- (b) to monitor and enforce policies, procedures and conditions applicable in relation to your use of MCC facilities and your attendance at or involvement in events hosted at the MCG, including the Conditions of Entry to the MCG, our health and safety policy and emergency evacuation procedures, to the extent that the MCC considers reasonably necessary to disclose or use your personal information for those purposes;
- (c) to deliver personalised content and send news and information about our activities, events and general promotional material which we believe may be useful to you, including (if applicable) our annual report and other club information, by email, post or other medium;
- (d) to allow MCC Special Interest Groups, Sporting Sections, Business Partners, Suppliers, Venue Hirers, or promoters of MCC or its services to market and promote their products and services to you, where permitted in accordance with section 3 (Disclosure to Third Parties);
- (e) to the extent that we consider it reasonably necessary, to monitor access to, ensure appropriate and lawful use of (including compliance with policies, procedures and conditions applicable to you or your attendance at or involvement in particular events, including those of Key Stakeholders), and profile the types of people attending MCC premises and using, MCC-owned websites, the MCG WiFi network, mobile applications and other MCC digital services such as in-venue messaging systems;
- (f) in relation to emails sent to us, for troubleshooting, maintenance purposes and for preventing or addressing email abuse;
- (g) for identity verification purposes;
- (h) to facilitate operational and administrative requirements, including learning and training purposes, management of and payment to Staff, the provision of services by our Suppliers and co-ordination of activities with the MCC's related organisations and MCC Special Interest Groups and Sporting Sections;
- (i) where you apply to become Staff, to process your job application and to verify qualifications and your suitability for the role; and
- (j) in relation to the personal information of Staff, for employment purposes, to allow the MCC to maintain records, communicate with and manage Staff and relationships with Staff, and to comply with applicable laws including employment, work health and safety and taxation laws.

The MCC may also collect, use and disclose personal information for purposes related or ancillary to the primary purpose of collection, including promoting such services and market research purposes.

Personal information that we collect for market research may be aggregated for analysis. Without limiting our ability to collect, use or disclose personal information for analysis or market research where permitted under the Privacy Laws, we may also use de-identified data for such purposes.

By electing to access our facilities or to acquire our services, you will be deemed to consent to us using your personal information in a manner consistent with this Privacy Policy, including monitoring your



use of any MCC-owned website. If you have any queries, please contact us using the details at the end of this Privacy Policy.

3. **DISCLOSURE TO THIRD PARTIES**

The MCC will only provide personal information to third parties where permitted by the Privacy Laws, other applicable laws and this Privacy Policy.

Disclosure of personal information to third parties may occur in accordance with section 2 (Use and Disclosure of Personal Information) where the third party:

- (a) is a related organisation to the MCC, such as the MCC Foundation Limited, the Australian Sports Museum Limited, MCC Heritage Limited, the MCG Trust as well as members of the MCC Committee, the MCC Sub-Committees and persons involved in the member disciplinary process;
- (b) is an affiliated organisation to the MCC, such as a Special Interest Group, a Sporting Section, a Key Stakeholder or a sporting organisation or venue with which the MCC has an affiliation or reciprocal arrangement, to the extent that the MCC considers it reasonably necessary to disclose information to those parties for purposes consistent with this Privacy Policy;
- (c) is appointed by the MCC to assist in delivering products, services or other functions (such as Suppliers), for purposes consistent with this Privacy Policy (noting that the MCC generally requires its Suppliers to comply with applicable laws in providing their services, including all appropriate privacy legislation);
- (d) is a governing body or responsible entity for events held at MCC venues, such as the Australian Football League, Cricket Victoria, Cricket Australia or the International Cricket Council, to the extent that the MCC considers it reasonably necessary to disclose information to those parties for purposes consistent with this Privacy Policy; or
- (e) is a Supplier (including a Business Partner) or Venue Hirer, and the personal information is utilised for direct marketing purposes (whether of the MCC or the third party), provided that (i) we consider that you would reasonably expect us to use your personal information for such purposes; (ii) you have consented to the use or disclosure for these purposes; or (iii) we are otherwise permitted to under the Privacy Laws or other applicable law.

We may also disclose personal information to third parties where otherwise required or permitted under the Privacy Laws or other applicable law, including where:

- (a) we believe that the use or disclosure is reasonably necessary to assist a law enforcement body or an agency responsible for government or public security in the performance of their functions; or
- (b) we are required or authorised by law to disclose the information.



4. **TRANS-BORDER DATA FLOWS**

Typically, we will store personal information at our premises, or with our service providers, in the State of Victoria.

However, in some circumstances your personal information may be transferred outside the State of Victoria, or outside Australia, where service providers with whom we may share that information under this Privacy Policy are located outside the State of Victoria or Australia. In addition, it is possible that we, or our service providers, will utilise cloud technology in connection with the storage of personal information, and it is possible that this may result in trans-border transfer or storage of your personal information. However, typically personal information held by our cloud service providers will be stored on servers within Australia.

To the extent that personal information is transferred or stored outside of the State of Victoria or outside Australia, we comply with our obligations under the Privacy Laws, by putting in place appropriate contractual arrangements or otherwise ensuring that the transfer meets the requirements of the relevant Privacy Laws.

By providing your personal information to us, you consent to our disclosure of your personal information to trans-border recipients in accordance with this section, and you acknowledge that by consenting we will be permitted to disclose your personal information to locations outside the State of Victoria or Australia. If you have any queries regarding the transfer of your personal information please contact us using the details provided below.

5. **SECURITY OF PERSONAL INFORMATION**

Personal information collected by the MCC may be stored in electronic databases and systems or in paper-based form.

We will take reasonable steps to protect the personal information which we hold from misuse or loss and from unauthorised access, modification or disclosure. This includes taking reasonable steps to ensure that our service providers have in place appropriate security measures. A range of security measures and processes are used by the MCC to protect your personal information, including:

- (a) network and computer security (such as login credentials);
- (b) physical venue security, access control systems and accreditation procedures; and
- (c) IT user policies, procedures and staff training.

We will take reasonable steps to destroy or de-identify personal information once we no longer require it for the purposes set out in this Privacy Policy.

When using MCC-owned websites you should be aware that no data transmission over the Internet can be guaranteed as totally secure. Although we strive to protect such information, we do not warrant the security of any such information that you transmit to us and you do so at your own risk.



We will take reasonable steps to destroy or permanently de-identify personal information where it is no longer needed for any purpose permitted under the Privacy Laws.

6. **ACCESS AND CORRECTION OF YOUR PERSONAL INFORMATION**

We will take such steps as are reasonable to ensure that the personal information which we collect and hold remains accurate, up to date and complete.

We will provide you with access to your personal information held by us unless we are permitted under the Privacy Laws or other applicable law to refuse to provide you with such access. You may:

- (a) make a request for access or correction of your personal information;
- (b) request further details about the way that the MCC handles personal information;
- (c) make a complaint about the way in which we have handled any privacy issue, including any alleged breaches of the Privacy Laws,

by contacting the Customer Services Manager during office hours on 03 9657 8888 or by email to privacy@mcc.org.au.

There is no charge for requesting access to your personal information but we may require you to meet our reasonable costs in actually providing you with access.

Any complaints will be individually investigated and dealt with in accordance with the MCC's obligations under the Privacy Laws.

7. **INFORMATION COLLECTED VIA OUR WEBSITES**

This section applies to the collection of information on MCC-owned websites including www.mcc.org.au, www.mcg.org.au and www.australiansportsmuseum.org.au.

When you visit a MCC-owned website, we may utilise 'cookies' which enable us to monitor traffic patterns and to serve you more efficiently. A cookie does not identify you personally but it does identify your computer. You can set your browser to notify you when you receive a cookie and this will provide you with an opportunity to either accept or reject it in each instance.

The MCC may also use your IP address to help diagnose problems with our systems or to help administer our website. In that context, your use as an individual user remains anonymous.

The MCC may collect and distribute aggregate statistics about our website visitors, traffic and usage patterns and related site information. These statistics do not include information that would allow the recipient to identify any individual.

8. **SURVEILLANCE ACTIVITIES**

The MCC operates surveillance cameras (including via closed-circuit television (**CCTV**) and body worn cameras used by our security officers) in the Melbourne Cricket Ground for various purposes consistent



with this Privacy Policy, including managing entry to our facilities, queue management, monitoring people movement and general operational purposes, employment purposes, the purposes of minimising and detecting unlawful activity or serious threats to safety, resolving complaints, investigating disciplinary actions and allegations preventing crowd disturbances and assisting law enforcement, Key Stakeholders and the MCC's security contractors in carrying out their responsibilities or as part of their investigations of inappropriate or unlawful conduct.

The recordings from surveillance cameras (including CCTV and body worn cameras), including personal information held on those recordings, may be provided:

- (a) to law enforcement bodies or an agency responsible for government or public security, to the extent that the MCC is required or authorised by applicable law; and
- (b) to third parties, including Suppliers or Key Stakeholders, in accordance with section 3 (Disclosure to Third Parties), to the extent that the MCC is required by applicable law or considers it reasonably necessary for purposes set out in this Privacy Policy.

We may use facial recognition technologies using surveillance cameras and cameras within Yarra Park Reserve and our facilities in limited circumstances, for the purposes set out above as well as for other purposes with which you have agreed, such as for entering our facilities or restricted areas. Further information is available in the Conditions of Entry to the MCG. MCC will not use body worn cameras in private areas such as toilets, showers, change rooms or lactation rooms unless their use is in accordance with an obtained warrant or authorised by law.

9. **SPECIAL INTEREST GROUPS AND SPORTING SECTIONS**

In some cases, Special Interest Groups and Sporting Sections may also be bound to comply with the Privacy Laws, the Information Privacy Principles and Health Privacy Principles (if applicable) and this Privacy Policy. Where applicable, the relevant Special Interest Groups and Sporting Sections each incorporate and adopt this Privacy Policy (as if the MCC were the respective Special Interest Group or Sporting Sections) but with the following differences:

- (a) Special Interest Groups and Sporting Sections may exchange information between themselves and with the MCC for internal organisational purposes or any other applicable purposes set out in this Privacy Policy.
- (b) Special Interest Groups and Sporting Sections collect their respective members' personal information for the purposes of providing sporting and social services to their members, and to enable the organisation of competitions and events in which their members participate. This may include the provision of:
 - (i) members' names, sporting status and handicaps; and
 - (ii) members' sporting histories and achievements;

to relevant sporting organisations and corresponding sporting clubs. This information is required to enable the organisation of competitions, events, providing trophies and awards and otherwise



assisting the operational requirements of the relevant Special Interest Groups and Sporting Sections.

Special Interest Groups and Sporting Sections may include advertising material in any mail out, but unless otherwise permitted by the Privacy Laws and other applicable law will not pass members' personal information on to third parties except as permitted under this Privacy Policy or applicable law. If a member requests that they do not wish to be sent separate advertising material, the Special Interest Group or Sporting Section will cease sending such advertising material in accordance with the Privacy Laws and other applicable law. Special Interest Groups and Sporting Sections are separate entities or other unincorporated groups or associations that are affiliated with the MCC, but are not always managed or administered by the MCC. In many cases those Special Interest Groups and Sporting Sections will not be bound to comply with the Privacy Laws, the Information Privacy Principles or this Privacy Policy, and as such this section will not apply. For the avoidance of doubt, the MCC is in no way responsible for the acts or omissions of Special Interest Groups and Sporting Sections or for their privacy practices.

10. GENERAL

This Privacy Policy may change from time to time. You may obtain a copy of our current policy from our website or by contacting us on the details above. This policy was last updated on the date specified at the beginning of this document.

SCHEDULE 1

DEFINITIONS

The following definitions apply to this Privacy Policy:

Business Partners means certain third party organisations with which the MCC has ongoing commercial, promotional or advertising arrangements with the MCC.

Health information means (a) information or an opinion about— (i) the physical, mental or psychological health (at any time) of an individual, (ii) a disability (at any time) of an individual, (iii) an individual's expressed wishes about the future provision of health services to him or her, (iv) a health service provided, or to be provided, to an individual— that is also personal information, (b) other personal information collected to provide, or in providing, a health service, (c) other personal information about an individual collected in connection with the donation, or intended donation, by the individual of his or her body parts, organs or body substances, or (d) other personal information that is genetic information about an individual in a form which is or could be predictive of the health (at any time) of the individual or of any of his or her descendants— but does not include health information, or a class of health information or health information contained in a class of documents, that is prescribed as exempt health information for the purposes of the Health Records Act.

Key Stakeholders means the Australian Football League (AFL), AFL clubs, Cricket Australia, Cricket Victoria and the Government of Victoria.

MCG means the Melbourne Cricket Ground.



Members means members of the MCC pursuant to the *Melbourne Cricket Club Act 1974 (Vic)* and the MCC's Constitution.

Patrons means any ticket holders, AFL members, AFL club members, hospitality guests or visitors to any facility or venue owned, operated or managed by the MCC from time to time, including the MCG, Yarra Park, Australian Sports Museum, MCC Kew Sports Club and Albert Ground, as well as customers of certain facilities such as the Hugh Trumble Café, Paddock Café and 'roof experience' customers.

Personal information means information or an opinion (including information or an opinion forming part of a database), that is recorded in any form and whether true or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion. For the purposes of this Privacy Policy, personal information includes sensitive information and health information, as applicable.

Privacy Policy means **this** document as amended from time to time.

Sensitive information means information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices or criminal record.

Suppliers means MCC contractors, Business Partners, third party suppliers (such as security contractors, first aid contractors, venue management contractors and other providers of goods or services to the MCC and its facilities) and sponsors.

Special Interest Groups means groups made up exclusively of MCC members to organise and host social events and activities.

Sporting Sections means sporting clubs and sections that are affiliated with the MCC to compete in organised sport at a variety of levels (including, where applicable, participants of the relevant sport or activity which may be Members or non-Members).

Staff means the MCC's full-time staff, part-time staff, casual staff, volunteers and recruitment candidates (including any applicant staff member or volunteer).

Venue Hirers means any entity or organisation that hires a facility or venue owned or operated by the MCC (including Yarra Park and the Australian Sports Museum). This includes event promoters and event owners.

Waiting List Candidates means individuals on the waiting list for MCC membership.