



# Privacy Policy

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**REEL Mates Pty Ltd.**

**ABN: 37 688 175 608**

## Section 1. Overview

- 1.1. This Policy (Privacy Policy) outlines how REEL Mates Pty Ltd. collects, uses, stores, and protects personal information.
- 1.2. We are committed to upholding privacy, especially given our work with children, their families, mentors, and volunteers.
- 1.3. We comply with the Privacy Act 1988 (Cth) and its amendments under the Privacy and Other Legislation Amendment Act 2024 (Cth) (the “Amendment Act”).
- 1.4. In this Policy, “Personal Information” refers to information or opinions about an identifiable individual, in any form.
- 1.5. This Policy applies to all REEL Mates’ programs, services, staff, volunteers, and those visiting our website and all online services operated by REEL Mates Pty Ltd.
- 1.6. We may update this Policy as legislation or operations change.

## Section 2. Types of Information We Collect

- 2.1. Depending on the reason for collecting it, the Personal Information we collect may include (but is not limited to):
  - a) your name and contact details.
  - b) copies of identification documentation.
  - c) Personal Information contained in forms or applications.
  - d) Personal Information contained in queries, or feedback about our services.
  - e) usage data (which may include your IP address, the pages you have clicked through on our websites, websites that referred you to our sites, information about the device you are using, and your wider geographic location).
- 2.2. We may collect Sensitive Information where necessary and with consent, and the collection is reasonably necessary for us to pursue one or more of our functions or activities. For these purposes, ‘Sensitive Information’ means:
  - a) information or an opinion about an individual’s
    - i. racial or ethnic origin,
    - ii. membership of a political association,
    - iii. religious beliefs or affiliations,
    - iv. philosophical beliefs,
    - v. membership of a professional or trade association,
    - vi. membership of a trade union,
    - vii. sexual orientation or practices,
    - viii. criminal record,
  - b) health information about an individual.
  - c) genetic information about an individual that is not otherwise health information.
  - d) biometric information that is to be used for the purpose of automated biometric verification or biometric identification, or biometric templates.
- 2.3. We do not use personal data for profiling or analytics beyond program delivery.

## Section 3. How We Collect Information

- 3.1. We will only collect your Personal Information by lawful and fair means, including by telephone, by letter, by email, or through forms on our websites.

- 3.2. Subject to clause 3.1:
- a) We may collect Personal Information from agents, contractors, subcontractors, employees, representatives, users of REEL Mates services, and volunteers.
  - b) On occasion, we may collect Personal Information from a third party. For example, Personal Information may be provided by third-party websites (refer to Section 10).
  - c) We collect user data through log files and cookies. You can block or delete cookies and still use our services.
- 3.3. We generally obtain consent from the owner of Personal Information to collect their Personal Information. Consent may be provided in writing or orally.
- 3.4. You are not required to provide the Personal Information and/or Sensitive Information we request. However, if you choose not to provide it, we may not be able to service your needs (see also Section 5).
- 3.5. You are free to browse our websites anonymously. However, when you are registering for our services, we require you to complete a brief application using your name or a pseudonym and provide a valid email address and/or phone number. It is impractical for us to manage and provide support if we cannot get in touch with you via email or phone call.

## **Section 4. Unsolicited Personal Information**

- 4.1. If we receive unsolicited personal information, we will determine if it is necessary for our operations. If not, we will securely destroy the information or ensure that it is de-identified, so long as it is lawful and reasonable to do so.

## **Section 5. How We Use Your Personal Information**

- 5.1. To the extent you submit content to public areas of our websites (for example, on an online forum), it will be available to the public and we may reuse or republish it.
- 5.2. If you have any concerns about us using your Personal Information in any of these ways, please notify us immediately.
- 5.3. We use your information to:
- a) Provide mentoring, fishing and educational activities.
  - b) Ensure participant safety and well-being.
  - c) Communicate with families, staff, and volunteers.
  - d) Providing you with information about the emails you have subscribed to receive.
  - e) Process registrations, payments, or donations.
  - f) Meet legal or funding requirements (using only de-identified data where possible).
  - g) Respond to emergencies or comply with child safety laws.
  - h) Answering queries and resolving complaints.
  - i) Complying with directions from authorities or legislative requirements.
  - j) Screening for or preventing potentially illegal or abusive activity.

## **Section 6. Storage, Security & Technical Safeguards**

- 6.1. We store information securely in locked cabinets for physical files and encrypted, password-protected systems for digital data.
- 6.2. The 2024 Amendment Act makes clear that we must implement both technical and organisational measures to protect data.
- 6.3. We take reasonable steps to:
- a) make sure that the Personal Information is accurate, up to date and complete, and (in the case of use and disclosure) relevant.

- b) protect the Personal Information from misuse, interference and loss, and from unauthorised access, destruction, use, modification or disclosure.
- 6.4. We retain personal information only as long as necessary or required under law.

## 7. Automated Decision-Making Transparency

- 7.1. REEL Mates does not use automated systems to make decisions that affect individuals' rights or participation in our programs. All decisions about applications, referrals, and program involvement are made by people.
- 7.2. If in the future we were to use any form of automated decision-making (for example, computer systems making eligibility decisions), we would update this Policy to clearly explain what personal information is used, what decisions are automated, and how they may affect individuals.
- 7.3. This approach ensures compliance with the *Privacy and Other Legislation Amendment Act 2024 (Cth)*, which requires organisations to disclose the use of automated decision-making processes.

## 8. Overseas Transfers of Personal Information

- 8.1. REEL Mates does not transfer, store, or disclose personal information outside Australia. All personal information we collect is managed and stored securely within Australia.
- 8.2. If this were ever to change in the future, we would update this Privacy Policy and ensure that any overseas transfers comply with the *Privacy Act 1988 (Cth)* and the *Privacy and Other Legislation Amendment Act 2024 (Cth)*, including using only approved jurisdictions or appropriate safeguards.

## 9. Responding to Privacy Breaches & Doxxing

- 9.1. REEL Mates takes privacy breaches seriously and recognises the new criminal offence of "doxxing" (the malicious online disclosure of personal information) which carries penalties of up to 7 years imprisonment under the Criminal Code Act 1995 (Cth), as amended by the Privacy and Other Legislation Amendment Act 2024 (Cth).
- 9.2. We will take immediate steps to stop any unauthorised disclosure of personal information, notify affected individuals, and report the incident to relevant authorities where required.
- 9.3. REEL Mates has zero tolerance for the misuse of personal information, including doxxing, and will cooperate fully with law enforcement or regulatory investigations in the event of such an incident.

## 10. Accessing and Correcting Your Information

- 10.1. You have a right to request access to your personal information, and we will respond promptly. If your information is inaccurate, incomplete, or out-of-date, we will correct it at your request.

## 11. Notification of a Data Breach

- 11.1. We follow the Notifiable Data Breaches scheme. If a breach occurs:
  - a) We will notify impacted individuals promptly.
  - b) We will investigate and mitigate harm immediately.
  - c) Tell you what steps we have taken to prevent a recurrence.
  - d) We will report serious breaches to the OAIC.

## **12. Complaint Handling**

- 12.1. If you have a complaint about how we collect or handle your Personal Information, please contact us using the contact details below. We treat any claims of privacy breaches seriously and will do our best to respond to your complaint within seven days of receiving it.
- 12.2. If you are not satisfied, you may complain to the Office of the Australian Information Commissioner (OAIC).

## **13. Statutory Tort for Serious Invasion of Privacy**

- 13.1. From 10 June 2025, the Privacy and Other Legislation Amendment Act 2024 (Cth) introduces a new statutory tort for serious invasions of privacy. This means that if REEL Mates, or anyone acting on its behalf, were to intentionally or recklessly invade an individual's privacy, that person may be entitled to seek legal remedies through the courts.

## **14. Children's Online Privacy Code (Upcoming)**

- 14.1. The Office of the Australian Information Commissioner (OAIC) is developing a Children's Online Privacy Code, which will set specific requirements for how online services handle children's personal information. While this Code has not yet been finalised, REEL Mates is committed to adopting and aligning our practices with it once it comes into effect.

## **15. Marketing and Communications**

- 15.1. We may contact you via email or phone about programs and opportunities. You can opt out anytime by contacting us. We will never sell or misuse your personal information.

## **16. Contact Us**

Please contact us if you have any queries about the Personal Information that we hold about you or the way we handle it. Our contact details are set out below:

Email us on [hello@reelmates.org.au](mailto:hello@reelmates.org.au)