

NEON BOXING ACADEMY PTY LTD - PRIVACY POLICY

This Privacy Policy explains how Neon Boxing Academy Pty Ltd (we, us or our) collects, uses, stores, and protects personal information in connection with our memberships, programs, facilities, website, and services, including information provided through third-party platforms used by us.

1. What Information Do We Collect?

The Personal Information we collect and hold will depend on your interactions with us and the services you use. The Personal Information we collect and hold may include:

- *full name, and date of birth;*
- *email address, postal address, phone number, and emergency contact details;*
- *health and medical information relevant to fitness training, such as injuries, medical conditions, or physical limitations;*
- *membership, booking history, and information you provide to us; and*
- *limited payment information, such as masked or partial details of your nominated bank account or payment card.*

Membership payments are processed through Worldpay for Platforms. Through our membership management system, we generally have access only to limited or masked payment information.

2. Types Of Information

The Privacy Act 1988 (Cth) (Privacy Act) defines types of information, including Personal Information and Sensitive Information.

Personal Information means information or an opinion about an identified individual or an individual who is reasonably identifiable:

- *whether the information or opinion is true or not; and*
- *whether the information or opinion is recorded in a material form or not.*

Personal Information may include, for example, your name, contact details, date of birth, membership information and other information that identifies you or makes you reasonably identifiable. Information that has been appropriately de-identified so that an individual is no longer reasonably identifiable will generally not be Personal Information. If the information does not disclose your identity or enable your identity to be ascertained, it will in most cases not be classified as "Personal Information" and will not be subject to this Privacy Policy.

Sensitive Information is a category of Personal Information that is afforded a higher level of protection under the Privacy Act. It includes information about an individual's racial or ethnic origin, political opinions, or associations, religious or philosophical beliefs, professional or trade association or trade union membership, sexual orientation or practices, criminal record, health information, certain genetic information, and certain biometric information. It is defined in the Privacy Act as including information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

For Neon Boxing Academy, the Sensitive Information we are most likely to collect is health information relevant to your safe participation in boxing, fitness training, and other physical activities, including information about injuries, medical conditions, or physical limitations.

We will only collect Sensitive Information where you consent and the information is reasonably necessary for our functions or activities, or where its collection is otherwise permitted or required by law. We will only use or disclose Sensitive Information for the purpose for which it was collected, for a directly related secondary purpose where permitted by law, with your consent, or as otherwise permitted or required by law.

3. How We Collect Your Personal Information

3.1. We generally collect Personal Information directly from you, or from your parent or guardian where you are under 18 years of age, when you apply for or manage a membership, book or attend classes, make an enquiry, participate in our programs or otherwise interact with us.

3.2. We may collect Personal Information through third-party platforms and service providers that we use to operate our business, including Club Link / Club Manager for membership and booking administration and Worldpay for Platforms for payment processing.

3.3. We may also receive Personal Information from other third parties where reasonably necessary for our functions or activities. Where required by law, we will take reasonable steps to notify you of the circumstances of that collection.

3.4. Where we collect Sensitive Information, including health information relevant to your safe participation in boxing, fitness training, or other physical activities, we will collect and handle that information in accordance with the Privacy Act, including obtaining consent where required.

4. Purpose Of Collection

4.1. We collect, use, and hold Personal Information where reasonably necessary to provide and manage our memberships, programs, facilities, and services. This may include administering memberships and class bookings, communicating with members, processing payments, maintaining membership records, responding to enquiries, managing health and safety, and operating and improving our business.

4.2. We may disclose Personal Information to third-party service providers that assist us in operating our business, including providers of membership, and booking systems, payment processing, information technology, maintenance, and support services. We only disclose Personal Information where reasonably necessary for these purposes or as otherwise permitted or required by law.

4.3. From time to time, we may send members newsletters, gym updates, or other communications about Neon Boxing Academy, including information about our programs, services, events, or promotions. Members may opt out of marketing communications through their communication preferences or by using any unsubscribe or opt-out method provided in the communication. We will honour requests to opt out in accordance with applicable law.

4.4. We do not use or disclose Sensitive Information, including health information, for direct marketing purposes unless you have provided the consent required by law.

5. Security, Access & Correction

5.1. We take reasonable steps to protect Personal Information we hold from misuse, interference, loss, unauthorised access, modification or disclosure. Personal Information relating to memberships, bookings and attendance is primarily stored and managed on our behalf through Club Link / Club Manager, a third-party membership management platform. Payments are processed through Worldpay for Platforms.

5.2. We retain Personal Information for as long as reasonably necessary for the purposes for which it was collected, to manage our relationship with you, and to meet our legal and record-keeping obligations. Where Personal Information is no longer required, we will take reasonable steps to destroy or de-identify it where required by law.

5.3. Subject to applicable exceptions, you may request access to Personal Information we hold about you in accordance with Australian Privacy Principle 12 and request correction of Personal Information in accordance with Australian Privacy Principle 13.

5.4. To request access to or correction of your Personal Information, please contact us using the contact details set out at the end of this Privacy Policy.

6. Complaint Procedure

6.1. If you have a complaint or concern about how we have handled your Personal Information or complied with our privacy obligations, please contact us using the contact details set out at the end of this Privacy Policy.

6.2. We will consider your complaint and may contact you for further information where necessary. If we determine that your complaint is well founded, we will take reasonable steps to address the issue.

6.3. If you are not satisfied with our response, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC).

7. Overseas Disclosure & Storage

7.1. We use trusted third-party service providers to operate our memberships, bookings, and payment systems, including Club Link / Club Manager and Worldpay for Platforms.

7.2. As a result, some Personal Information may be stored or processed outside Australia by these service providers or their authorised sub-processors. We take reasonable steps to ensure that our service providers handle Personal Information in accordance with applicable privacy laws and appropriate security standards.

7.3. Where required under the Privacy Act 1988 (Cth), we will take reasonable steps in relation to any overseas disclosure of Personal Information.

8. How To Contact Us About Privacy

8.1. If you have any questions about this Privacy Policy, wish to request access to or correction of your Personal Information, or have a complaint or concern about our privacy practices, please contact us at: Email: info@neonboxingacademy.com.au