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	Issue Date:	22 December 2017
	Doc owner:	Chief Financial Officer
	Responsible authority:	CEO
	Document No.:	POL-FIN-008
Privacy Policy	Next review date:	December 2018

Privacy Policy

1. Purpose

The aim of this policy is to formalise Phillip Island Nature Parks (**Nature Parks**) commitment to ensuring the privacy of personal information collected or provided to us, and for this information to be handled in an open and transparent manner. We believe that respect for privacy forms part of the ongoing trust we wish to develop and maintain with our stakeholders.

2. Scope

	Board Members / CEO	Employees	Volunteers	Contractors	Visitors
This policy applies to:	✓	✓	✓	✓	✓

Note: The Privacy Policy applies generally to the whole Phillip Island Nature Parks website, as well as in the other situations described in this document.

3. Definitions

Term	Definition
Apps	Program/software. An application downloaded by a user to a computing device.
Cookies	Data files that are sent from a website and stored in the user's browser while browsing
Personal information	Has the meaning given to that term in the <i>Privacy and Data Protection Act 2014</i> (Vic). "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, but does not include information of a kind to which the Health Records Act 2001 applies

4. Policy


The Nature Parks has established this Privacy Policy in compliance with the Information Privacy Principles (**IPPs**) and to help you to understand your rights under the *Privacy and Data Protection Act 2014*.

4.1 Collection of Personal Information (IPP1)

The Nature Parks only collects personal information which enables us to carry out operational activities consistent with the performance of our mission and vision, or which you otherwise provide to us.

Personal information is collected through, but not limited to, the following mechanisms:

- via our admissions and ticketing processes
- when visitors make purchases at our retail shops
- when visitors utilise our Wi-Fi facilities, or access our Apps
- when browsers visit our website (which uses standard features such as Cookies)

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- when making a donation
- when responding to a survey
- when information is requested by us
- when participating in an education or community program run by Nature Parks, or attending a conference or other event on Nature Parks premises
- via our recruitment and employment processes (including work experience and volunteer programs).

The Nature Parks holds information in its databases including visitor's names, addresses, contact details and date of birth. In the case of overseas visitors, the country of residence is recorded. When you visit our website, we use Cookies to collect information, as noted above. In respect of educational programs, the Nature Parks will collect names, addresses and contact details in respect of students, teachers and parents / guardians, as well as additional information relating to the relevant school.

If you are an employee or volunteer with Nature Parks, or if you participate in certain educational or community programs, we will collect information which may be considered health information for the purpose of the *Health Records Act 2001* (Vic). In this document, references to personal information include references to health information, as that term is defined in the *Health Records Act 2001* (Vic).

We may also hold credit card information and other banking information for various payment purposes.

4.2 Use and Disclosure of Personal Information (IPP2)

Nature Parks uses the personal information it collects for the purpose of:

- carrying out Nature Parks' operational activities
- advertising and promoting Nature Parks' products and events.

The Nature Parks may disclose personal information to its third party providers, including marketing and communications services providers, hosting providers and other providers of outsourced IT services, including payroll processing services, to the extent required for those providers to perform services or provide goods to Nature Parks.

The Nature Parks may also use non-identifying and aggregate information for market research and planning. In some circumstances the Nature Parks is required or authorised by law to release information to government agencies, law enforcement bodies or following a request under the *Freedom of Information Act 1982* (Vic).

4.3 Data Quality (IPP3)


The Nature Parks shall take reasonable steps to ensure that the personal information that it collects, uses, holds or discloses is accurate, complete and up to date.

4.4 Security of Personal Information (IPP4)

The Nature Parks has procedures in place to protect the personal information it holds against misuse, loss and from unauthorised access, modifications or disclosure. When personal information is no longer required by us, we will take reasonable steps to destroy or permanently de-identify that information.

4.5 Openness (IPP5)

The Nature Parks has clearly expressed our policy (this document) in relation to the way we manage personal information. Our Policy is available upon request, and is also available on the [external website](#).

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4.6 Access to, and Correction of, Personal Information (IPP6)

The Nature Parks shall provide individuals with access to their personal information held by us, unless there are legitimate reasons under the *Privacy and Data Protection Act 2014* not to provide access.

Please contact the Nature Parks Privacy Officer in writing (using the contact details set out below) if you:

- wish to have access to the personal information that we hold about you
- consider that the personal information that we hold about you is not accurate, complete or up to date
- require further information on our personal information management practices.

Privacy Officer
Phillip Island Nature Parks
PO Box 97
Cowes Victoria 3922

4.7 Unique Identifiers (IPP7)

The Nature Parks do not assign unique identifiers to individuals for purposes such as data matching, or adopt unique identifiers which may have been assigned by another organisation.

4.8 Anonymity (IPP8)

It is not feasible for online transactions (such as ticket or retail purchases) to be anonymous. For transactions such as over the counter ticket or retail sales, it is possible for the transaction to occur without the individual providing information such as postcode or country from which the visitor is from.

4.9 Transborder Data Flows (IPP9)


The Nature Parks generally do not undertake activities where personal information collected would be moved outside Victoria. If personal information were to travel outside of Victoria, the privacy protection stipulated in this policy will travel with it.

4.10 Sensitive Information (IPP10)

The Nature Parks do not collect personal information relating to race, political opinions or membership of political associations, religious or philosophical beliefs, membership of professional or trade associations or trade unions, sexual preferences or practices, or criminal record (except in relation to criminal history checks in relation to employment with the Nature Parks). Visitor demographics are collected for marketing purposes.

4.11 Complaints

If you think that your privacy has been interfered with due to a breach of our obligations, then you may lodge a complaint directly with our nominated Privacy Officer (using the contact details set out above). If you are not satisfied with the response of the Privacy Officer, this matter will be escalated to the Executive Management Team.

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5. Related documents

Legislation/Regulations	Privacy and Data Protection Act 2014
Policies	
Procedures	
Forms	

6. Approval

Document reviewed by:

- Chief Financial Officer
- Manager Human Resources
- Manager Marketing and Communications

Document Approved by:

- Chief Executive Officer

Signed:



Catherine Basterfield
Chief Executive Officer
22 December 2017