

PRIVACY PROCEDURE

1. Purpose

Nature Parks is committed to ensuring the privacy of personal information collected or provided to us during the fulfilment of our business functions, in accordance with our obligations and your rights under the *Privacy and Data Protection Act 2014 (Vic)*.

We believe that respect for your privacy and advising you that we are collecting private or sensitive information, forms part of the ongoing trust we wish to develop and maintain with our stakeholders.

2. Scope

Applies to:	Board Members CEO	Employees	Volunteers	Contractors	Visitors
	✓	✓	✓	✓	✓

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

3. Definitions

Term	Definition
Application (Apps)	Program, software, or an application downloaded or accessed by a user to a computing device.
Cookies	Data files that are sent from a website and stored in the user's hard drive while browsing and remain until such time that they are deleted.
Personal information	The meaning in the <i>Privacy and Data Protection Act 2014 (Vic)</i> is "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...."

4. Procedure

Nature Parks approach to privacy aligns with the Information Privacy Principles (IPPs) which outline your personal information management rights under the *Privacy and Data Protection Act 2014 (Vic)*. If you tell us you are located in the European Union and advise us that you wish to exercise the additional rights available to you under the *General Data Protection Regulation*, we will endeavour to meet those requests.

4.1 Collection of Personal Information

Nature Parks collects personal information which enables us to carry out operational activities consistent with the performance of our purpose and vision, our legal and regulatory obligations, or which is otherwise provided to the Nature Parks. Personal information is collected through, but not limited to, the following mechanisms:

- via our face to face and online admissions and ticketing processes
- when visitors make purchases at our retail shops or make online retail purchases

- when browsers visit our website (which uses standard features such as Cookies)
- when visitors utilise our Wi-Fi facilities, or access and download our Applications
- when visiting our attraction centres and carparks, through our use of security cameras and Bluetooth low energy beacons, or if you are reporting or involved in a hazard or incident
- when signing up to Nature Parks mailing lists
- when making a donation
- when responding to a survey or providing feedback through community consultation processes
- when information is requested by us (e.g. when reporting or retrieving valuable items of lost property) or when it is required for compliance purposes (such as our gifts and hospitality register process)
- when participating in an education, community or volunteer program run by Nature Parks, or attending a conference or other event on Nature Parks sites
- via permission to take, and authorisation to use, any photographic video, audio or any other form of electronic recording made of visitors to Nature Parks, or participants in Nature Parks activities
- via our recruitment and employment processes (including work experience and volunteer programs)
- via our contractor engagement processes.

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

Nature Parks holds information in its databases including visitor's names, physical and email addresses, contact details and date of birth. In the case of overseas visitors, the country of residence is recorded. In respect of educational programs, Nature Parks will collect names, addresses and contact details of participating students, teachers and parents/guardians, as well as information relating to the relevant school.

If you are an employee or volunteer with Nature Parks, or if you participate in our educational or community programs, we may collect information which may be considered health information for the purpose of the *Health Records Act 2001 (Vic)*. We will also collect personal or sensitive information during the course of your ongoing employment.

This publicly available document acts as our overarching collection notice, providing details on how Nature Parks collects and manages private information. In addition, Nature Parks must provide specific collection notices to individuals at the time of collecting personal information (e.g. collecting details as part of an incident report form, or to support contract tracing in accordance with government directives).

4.2 Use and Disclosure of Personal Information

Nature Parks uses or discloses the personal information for the intended primary purposes for which it was collected; this includes:

- carrying out Nature Parks operational activities, including employment related activities
- advertising and promoting Nature Parks products and events.

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.

Nature Parks will not sell or rent personal details with third parties.

Where electronic commercial messages relating to Nature Parks goods and services are sent (via email, SMS, MMS or instant message) they must:

- only be sent with the permission of the intended recipient (the person being contacted, who gave their permission via opting-in to communications at the time of ticket purchase etc)
- include sender identification, such as name and contact details, and clearly indicate our organisation
- provide a functional and no-cost (or low cost) option for the recipient to “opt-out” and stop receiving electronic commercial messages; the request must be actioned within five business days.

Nature Parks may also use non-identifying and aggregate information for market research and planning. Nature Parks may use customer relationship management (CRM) processes to assist in operational activities. No opinions about individuals will be expressed, nor record such information in conjunction with the personal information it collects, uses, holds or discloses.

In some circumstances, 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)*. Personal information will only be used or disclosed (for other than intended primary purpose) when the use or disclosure is necessary to lessen or prevent serious threat to life, health, safety or welfare of an individual or of the general public.

4.3 Data Quality

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. Nature Parks may undertake periodic checks to ensure the information remains valid and relevant, and to maintain quality of the information.

4.4 Data Security

Nature Parks has procedures in place, and periodically tested, to protect the personal information it holds against misuse, loss and from unauthorised access, modifications, or disclosure. The databases of personal information collected are securely maintained either internally on our computer networks, or externally through our cloud-based software providers. When personal information is no longer required by us, reasonable steps will be taken to securely destroy or permanently de-identify that information, taking into consideration relevant records management requirements.

4.5 Openness

In this document, Nature Parks has clearly expressed the way we manage personal information. This document is available upon request, and is also available on the [external website](#) and via our terms and conditions.

4.6 Access and Correction

Nature Parks shall provide individuals with access to their personal information held by us, and make corrections to the information if necessary, unless there are legitimate reasons under the *Privacy and Data Protection Act 2014 (Vic)* not to provide access.

Please contact 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 we hold about you is not accurate, complete or up to date
- require further information on our personal information management practices.

Attention: Privacy Officer
Phillip Island Nature Parks
PO Box 97
Cowes Victoria 3922
Email info@penguins.org.au

If you are an employee and wish to access personal information, please contact People and Culture team.

4.7 Unique Identifiers and Anonymity

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.

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

4.8 Transborder Data Flows

Nature Parks generally do not undertake activities where personal information collected would be moved outside Victoria. However, it is acknowledged that some organisations to which we disclose information to may be located, or may store information, outside Victoria. Where this is this case, and personal information has the potential to travel outside of Victoria, all efforts are taken to ensure that the recipient organisation has in place privacy protections equivalent to the obligations applicable to Nature Parks.

4.9 Sensitive Information

Nature Parks do not collect personal information relating to race or ethnic origin, political opinions or membership of political associations, religious beliefs or affiliations, 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 Nature Parks). Visitor demographics are collected for marketing purposes.

4.10 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 Nature Parks Chief Executive Officer contactable at the same address detailed above.

5. Related Documents

Legislation/Regulations	Privacy and Data Protection Act 2014 (Vic) Freedom of Information Act 1982 (Vic)
Policies	Information Communication Technology Management Policy POL-IT-006 Gifts, Benefits and Hospitality Policy POL-CEO-003 Public Interest Disclosures Policy POL-HR-019
Procedures	Public Wi-Fi Service Privacy Terms Covid-19 Privacy Notice
Forms	

6. Review and Approval

Document reviewed by:

- Chief Financial Officer
- General Manager Tourism Operations
- Manager People and Culture
- Manager Conservation
- Manager Marketing and Communications
- Manager Commercial
- Manager Visitor Experience

Document Approved by:

- Chief Executive Officer