

PRIVACY

1. Purpose

The Nature Parks (Phillip Island Nature Park Board of Management Inc. ABN 88 940 950 118) understands the importance of protecting the privacy of your personal information and is committed to ensuring it maintains responsible and transparent information handling practices. This document sets out how the Nature Parks manages your personal information, aims to protect the privacy of your personal information, and your rights in relation to your personal information.

In handling your personal information we comply with applicable privacy legislation including the:

- *Privacy and Data Protection Act 2014 (Vic) (PDP Act)* and the Information Privacy Principles (IPPs) in the PDP Act which outline how we must handle personal information; and
- *Health Records Act 2001 (Vic) (HR Act)* and the applicable Health Privacy Principles which outline how we must handle health information.

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.
Health information	Includes information or an opinion about a living or deceased individual's physical, mental or psychological health or disability that is also <i>personal information</i> [see the <i>Health Records Act 2001 (Vic)</i> for the full definition of health information].
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, but does not include information of a kind to which the Health Records Act 2001 (Vic) applies."
Sensitive information	The meaning in the <i>Privacy and Data Protection Act 2014 (Vic)</i> is "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, criminal record, that is also personal information."

4. The types of personal information we collect

The Nature Parks is a unique conservation organisation that operates ecotourism experiences on Phillip Island. Revenue raised through our attractions is invested in research, conservation and education programs.

We collect personal information that is necessary for us to carry out our functions and activities consistent with the performance of our purpose and vision, our legal and our regulatory obligations.

Generally, the types of personal information we collect are:

- name, contact details (physical/email address, mobile numbers), age, postcode or country of residence;
- credit card information and other banking information necessary for various payment purposes;
- in respect of educational programs, names, addresses and other contact details of participating students, teachers and parents/guardians, as well as information relating to the relevant school;
- visitor demographics (for marketing purposes).

If you are an employee or volunteer with the Nature Parks, or if you participate in our educational or community programs, we may collect information relevant to your qualifications and work history, and health information from you. We may also collect personal information and sensitive information during the course of your employment or volunteering period.

Where it is lawful and practicable we will ensure you do not have to identify yourself when you are transacting with us. However, this will not always be possible, for example it is not practicable for online transactions (such as ticket or retail purchases) to be anonymous.

You are under no obligation to provide your personal information to the Nature Parks. However, without certain information from you, we may not be able to provide our products and/or services to you.

5. How and when we collect personal information

Generally, we collect your personal information or other information related to you directly from you through:

- admission and ticketing processes (both face-to-face, online or through a third-party agent)
- retail purchases (in-store and online)
- website interactions (including via cookies)
- use of our Wi-Fi facilities, or access and download of our *applications* (including any program, software, or an application downloaded or accessed by a user to a computing device)
- visits to our attraction centres and carparks through our use of security and surveillance cameras and devices and Bluetooth low energy beacons
- reporting or being involved in a hazard or incident
- signing up to the Nature Parks mailing lists
- making, or requesting, a donation to or from the Nature Parks
- responding to a Nature Parks survey or providing feedback to the Nature Parks through community consultation processes

- responding to a request from us (e.g. when making permit applications or media enquiries) or when it is required for compliance purposes (such as our gifts and hospitality register process)
- participating in an education, community, competition (including if run through a third-party agent) or volunteer program run by the Nature Parks, or attending a conference or other event on the Nature Parks sites
- your permission to take, and authorisation to use, any photographic video, audio or any other form of electronic recording made of you as a visitor to the Nature Parks or a participant in the Nature Parks activities
- our recruitment and employment processes (including work placement (tertiary, secondary, VCAL, or internships) and volunteer programs); and
- our contractor engagement processes
- cameras installed for the purposes of monitoring wildlife, or security cameras for the safeguarding of our site and attraction assets, may capture your image.

6. How we use and disclose personal information

The Nature Parks uses or discloses the personal information for the purposes for which it was collected, including:

- providing ecotourism experiences
- carrying out the Nature Parks operational activities, including conservation and research programs, employment related activities, and educational activities, volunteer programs, and community programs and events
- advertising and promoting the Nature Parks products and events
- employing persons to work at the Nature Parks.

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

In some circumstances, the Nature Parks may be required or authorised by law to use or disclose personal information for other purposes, including disclosure to government agencies, law enforcement bodies or following a request under the Freedom of Information Act 1982 (Vic) (FOI Act). The Nature Parks would consider the application of any exemptions provided under the FOI Act (such as the 'Document affecting personal privacy' exemption) before deciding to release information following a FOI request).

The Nature Parks will not sell or rent personal information to third parties.

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

7. How we protect personal information

The Nature Parks takes reasonable steps to protect the personal information that it holds from misuse and loss and from unauthorised access, modification or disclosure. The Nature Parks has procedures in place, and periodically tests those procedures, to protect the personal information it holds against misuse, loss and from unauthorised access, modifications, or disclosure. The Nature Parks holds personal information in both hard copy and electronic forms in secure databases on secure premises, accessible only by authorised staff.

When personal information is no longer required by us, reasonable steps will be taken to destroy or permanently de-identify that information, taking into consideration relevant records retention requirements.

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

8. Access, Correction and Complaints

The Nature Parks takes steps reasonable in the circumstances to ensure personal information it collects, uses or discloses is accurate, complete and up to date.

You have the right to access and seek correction of your personal information that we hold in accordance with and subject to the PDP Act or the HR Act (as applicable).

If you wish to access or correct the personal information the Nature Parks holds about you, please contact The Nature Parks Privacy Officer in writing (using the contact details set out below):

Attention: Privacy Officer

Phillip Island Nature Parks

PO Box 97

Cowes Victoria 3922

OR

Email info@penguins.org.au

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

If you are a volunteer in Nature Parks volunteer program and wish to access personal information, please contact volunteers@penguins.org.au

To obtain access to your personal information that we hold:

- you will have to provide proof of identity to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected
- we request that you be reasonably specific about the information you require; and
- we can provide you with a copy of your personal information in our current records free of charge. If we need to provide access to non-current records, we may charge you a reasonable administration fee, which reflects the cost to us for providing access in accordance with your request.

If you wish to make a privacy complaint, please contact our Privacy Officer using the contact details above.

9. Transfer outside Victoria

The Nature Parks will only transfer personal information outside Victoria where we reasonably believe that the recipient of the personal information is subject to a law, binding scheme, or contract which effectively upholds principles for fair handling of the information that are substantially similar to the IPPs.

10. 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
Procedures	Public Wi-Fi Service Privacy Terms Freedom of Information Procedure PRO-ICT-010 Gifts, Benefits and Hospitality POL-CEO-003 Public Interest Disclosures POL-HR-019
Forms	Freedom of Information Application FRM-ICT-008

11. Review and Approval

Document reviewed by:

- Chief Financial Officer
- People and Culture Manager
- Marketing and Communications Manager
- Risk and Compliance Officer
- Finance Manager
- Senior IT Lead
- General Manager Tourism
- Attraction Managers
- Sales Manager
- Commercial Operations Manager
- General Manager Infrastructure and Planning
- Facilities Manager
- General Manager Conservation
- Research Manager
- Reserves Manager
- Wildlife Manager
- Community Impact Manager

Document Approved by:

- Chief Executive Officer
Issue Date : 12 July 2024