

# Privacy Policy - Attunga Ski Lodge Limited

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## YOUR PRIVACY IS IMPORTANT TO US

Attunga Ski Lodge respects your privacy. Our directors, contractors and service providers are required to read this policy and understand their responsibilities when dealing with personal information.

## IN THIS POLICY:

- 'members' refers to members of the Lodge (at times also referred to as Attunga Ski Club) who are entitled by virtue of their shareholding in Attunga Ski Lodge Limited (ACN 003 043 016) to the benefits of membership of the Lodge;
- 'sensitive information' – refers to information about a person's racial or ethnic origin, political opinions or associations, religious beliefs or affiliations, philosophical beliefs, trade and professional memberships, sexual preferences or practices, criminal record or health information;
- 'the Lodge we, us and our' refer to Attunga Ski Lodge (or where the context permits, to Attunga Ski Lodge Limited);
- 'you and your' refer to you, an individual whose personal information we may deal with; and
- 'personal information' refers to any information or an opinion whether true or not, from which an individual's identity is apparent, or can reasonably be ascertained.

## OUR PRIVACY PRINCIPLES

The Lodge is bound by the National Privacy Principles (NPPs) in the Privacy Act 1988 (the Act). We have adopted internal policies and procedures to ensure that your personal information is dealt with in accordance with the NPPs. You can see the full text of the NPPs online at [www.oaic.gov.au](http://www.oaic.gov.au)

## FREQUENTLY ASKED QUESTIONS

We generally do not disclose a member's personal information to third parties. Exceptions include where we are required to disclose confidential information by force of law, and where the third party agrees only to use or disclose the information as authorised by the Lodge.

We never disclose any personal information except in accordance with this policy. If you do not wish to provide us with all the personal information we request from you, we may not have sufficient information to comply with our obligations under various legislation, or our own administrative procedures required for prudent management of the Lodge's operations.

## SENSITIVE INFORMATION

We are particularly concerned to deal appropriately with sensitive information. We may need to collect your sensitive information in some circumstances and for specific purposes (e.g., where it is necessary for the establishment, exercise or defence of a legal or equitable claim and we have agreed to provide associated legal services). Where we are at liberty to do so, and it is practicable to do so, we will seek your consent before collecting your sensitive information and inform you of the purpose at the same time.

## COLLECTION

We will ask you to provide us with your personal information when you apply to become a member of the Lodge, or apply to become an employee of or contractor to the Lodge, or make an inquiry, where your personal details are required to fulfil the query, or when wish to contact us online or via our website.

## USE

We will use your personal information to improve our services to members and their guests;

- where reasonably required to provide anything that the Lodge provides to members and their guests;
- to derive or aggregate anonymous information from which you cannot be identified as an individual;
- to prevent or lessen a threat to a person's life or health;
- where disclosure is reasonably necessary for the establishment, exercise or defence of a legal or equitable claim
- for the purpose for which it was collected, or for a related purpose (where the personal information is sensitive information, the related purpose will be a directly related purpose) that you would reasonably expect from us;
- for other purposes permitted, required or authorised by or under law; and
- for any other purpose, where you have consented to its use for that purpose.

## DISCLOSURE

We will not disclose your personal information to a third party unless:

- the disclosure is for a primary purpose for which the information was collected;
- you have consented to the disclosure;
- the third party is our agent or contractor, in which case we will require them to keep your personal information confidential and to use it only for the purpose for which it was disclosed;
- there are reasonable grounds to believe that disclosure is necessary to prevent or lessen a threat to your life or health or that of another person;
- the disclosure is to a related body corporate;
- the disclosure is reasonably necessary for the establishment, exercise or defence of a legal or equitable claim; or
- the disclosure is permitted, required or authorised by or under law.
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## OUR WEBSITE

To ensure we are meeting the needs and wants of our website users, and to develop our online services, we may collect aggregated information using cookies. Cookies will track your use of our web site, and may also be used to compile statistics on visits to the site in an aggregated form and log anonymous information such as:

- the address of your server,
- your top level domain (such as .com. or .au)
- the date and time of your visit
- the pages you accessed and downloaded
- the search engine you used
- what type of browser was used

When you visit our site a Cookie may be placed on your machine. Where you have visited us before the Cookie may be read each time you re-visit the site.

We do not use this technology to access your personal information and you cannot be personally identified from a Cookie.

If you choose not to have your browser accept Cookies from our site, you will still be able to view the text on the screens.

## MARKETING

From time to time, we may advise you of new services and marketing initiatives that we think may be of interest to you. This may include newsletters and general information about the Lodge. If you would prefer not to receive such communications from us, please contact our Privacy Officer to be removed from the relevant circulation list. Contact details for our Privacy Officer are included at the end of this policy. Please note that we may require written confirmation of your request, for example where legislation requires us to provide particular communications to you.

## ACCESS TO YOUR PERSONAL INFORMATION

Where we hold your personal information, we will provide you with access if you request. We will try to allow you access in a form and manner suitable to your needs. See also "Restrictions on Access" below.

To request access, please contact our Privacy Officer.

## CORRECTION OF RECORDS

If we hold your personal information and you notify us that it is not accurate, complete or up-to-date, we will take reasonable steps to correct the information in the manner that you have requested. If we consider that the information we retain does not require amendment, we will annotate your request on our files.

## RESTRICTIONS ON ACCESS

Where providing access would reveal evaluative information generated within the Lodge in connection with a commercially sensitive decision-making process, the Lodge may give you an explanation for the decision, rather than direct access to the information.

If we have given you such an explanation and you believe that direct access to the evaluative information is necessary to provide a reasonable explanation of the reasons for the decision, we will, at your request, review the decision. Personnel other than the original decision-maker will conduct the review.

Wherever direct access by you is impractical or inappropriate, we should consider together whether the use of mutually agreed intermediaries would allow sufficient access to meet both our needs.

The Act recognises that there are some situations where it is not appropriate to provide you with access. For example when:

- providing access would pose a serious and imminent threat to the life or health of any individual providing access would have an unreasonable impact upon the privacy of other individuals;
- the request for access is frivolous or vexatious;
- the information relates to an anticipated or existing legal dispute and disclosure would compromise our position.

Should any of the situations arise, you may be denied access.

## CHARGES FOR ACCESS

If the Lodge levies charges for providing access to personal information, those charges will be reasonable and will not be excessive. We will not charge you for lodging a request for access. We will provide an estimate of charges to you if you ask for it, or if it appears to us that the work will be onerous or otherwise warrants charges.

## SECURITY

We are committed to maintaining safeguards to protect personal information against unauthorised use, disclosure, access, alteration, destruction and accidental loss. All personal information we hold is dealt with in accordance with the NPPs and Industry standards for the security and protection of information. Your personal information is stored securely and access is restricted to authorised personnel only. Our computer systems require access passwords, and these are kept secure. Internal policies exist on management of personal information and staff and relevant contractors are required to ensure compliance with these policies. All our staff and relevant contractors are required to read this policy and understand their responsibilities in relation to your personal information.

## OVERSEAS TRANSFER

We will not transfer your personal information outside Australia unless:

- we reasonably believe that the recipient of the information is subject to legal obligations that uphold principles for the protection and fair handling of personal information that are substantially similar to the principles contained in this policy;
- you give us your consent to do so, expressly or by implication;
- we are contractually required to do so; or
- the transfer is for your benefit and it is not practicable for the Lodge to obtain your consent and if you were able to grant consent, you would be likely to give it. In this instance we will advise you to whom your information has been disclosed as soon as practicable.

## CHANGES TO OUR POLICY

We may update or change this policy from time to time. When we do so, we will publish the current policy on our web site, and make it available in hardcopy on request by contacting our Privacy Officer.

If you have any suggestions or concerns that are not addressed in this privacy policy, please contact our Privacy Officer.

Contact details for our Privacy Officer are included at the end of this policy.

## COMPLAINT RESOLUTION

We are committed to constantly improving our procedures so that your personal information is treated appropriately.

If you feel that we have failed to deal with your personal information in accordance with the NPPs or this policy, please speak to us so that we have an opportunity to resolve the issue to your satisfaction.

The person to contact is our Privacy Officer.

Our Privacy Officer will manage the following process for us to:

- listen to your concerns and grievances regarding our handling of your personal information;
- discuss with you the ways in which we can remedy the situation; and
- put in place an action plan to resolve your complaint and improve our information handling procedures if appropriate.

If this process does not result in an outcome that is satisfactory to you, you may contact the Information Commissioner's Office. We will work together with the Information Commissioner's Office to resolve the issues between us.

The contact details for the Information Commissioner's Office are as follows:

*GPO Box 5218 Sydney NSW 2001*

*Tel: 1300 363 992*

E-mail [enquiries@aoic.gov.au](mailto:enquiries@aoic.gov.au)

Further information about privacy and your rights can be obtained at the Federal Information Commissioner's website at [www.oaic.gov.au](http://www.oaic.gov.au).

## CONTACT INFORMATION

If you wish to access any personal information of yours that we are storing, or have a query about this policy, please contact our Privacy Officer

In the absence of a notice that we post prominently on our website to be read with this Policy, our Privacy Officer is the Secretary for the time being of Attunga Ski Lodge Limited and he may be contacted at:

**November 2013**