

# Soulcraft Australia & New Zealand Privacy Policy

Soulcraft Australia & New Zealand (SANZ) is committed to complying with the Australian Privacy Principles as detailed in the Privacy Amendment (Enhancing Privacy Protection) Act 2012, which amends the Privacy Act 1988 and subsequent reforms to this act in March 2014 which now frames requirements for privacy provisions of all applicable legislation.

This Privacy Statement outlines how we may collect, use, hold, disclose and otherwise handle personal information in the course of our operations.

## What kinds of personal information does SANZ collect and hold?

“Personal information” is 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 recorded in a material form or not. This includes information we have collected from you or from other organisations. Generally, the kinds of personal information SANZ collects are:

- contact and identification information such as name, address, telephone number, email address and date of birth;
- emergency contact details and next of kin;
- banking and credit card details;
- sensitive information (e.g. information about health, dietary requirements, injuries, medical history, specific conditions, criminal record) which will only be collected with the consent of the individual; and
- other information required for SANZ’s functions and activities.

In some circumstances SANZ may also hold other personal information provided by an individual.

## How does SANZ collect personal information?

Personal information will be collected directly by an individual who:

- completes an online or hard copy form in relation to SANZ services; and
- otherwise provide SANZ with personal information in person or via telephone, email, sms, fax, post or other means, whether at SANZ’s request or through an individual’s own initiative.

Personal information may also be collected from a source other than directly from an individual, such as from:

- educational organisations;
- family members and relatives (e.g. parents, spouses);
- community groups and religious organisations;
- an individual’s employer or the organisation that an individual works with;
- sporting groups; and
- agencies that undertake criminal history checks and working with children checks.

Generally, SANZ will only collect personal information from sources other than an individual if it is unreasonable or impracticable to collect the personal information from that individual.

## Why does SANZ need personal information?

SANZ collects, holds, uses and discloses personal information where it is reasonably necessary for the purposes of carrying out its functions and activities, including:

- booking, organising and administering outdoor experiences for program participants, including assessing accommodation needs, catering requirements, and the like;
- responding to health-related or dietary incidents that may arise;
- conducting risk assessments and hazard identification;
- accounting, billing and other internal administrative purposes; assessing an application for the purpose of engaging an individual as a contractor or consultant; and
- any other legal requirement.

SANZ may also use personal information for purposes related to the above purposes and for which an individual would reasonably expect SANZ to do so in the circumstances, or where that individual has consented or the use is otherwise in accordance with law.

An individual is under no obligation to provide personal information to SANZ. However, without certain information from that individual, SANZ may not be able to provide its services. (For example, failing to provide certain information may preclude participation in programs or events organised and administered by SANZ.)

## Disclosure of personal information

SANZ discloses personal information for the purpose for which we collect it. Generally, SANZ will only disclose personal information for a purpose set out above. This may include disclosing personal information to:

- third parties engaged to perform administrative or other business management functions;
- SANZ's subcontractors, including activity specialists, venue owners, catering contractors, IT contractors and database designers;
- doctors, hospital and/or police in the event of an emergency incident involving an individual;
- SANZ's professional advisors and consultants;
- insurance providers;
- any other entity with the individual's consent, or to whom disclosure is required or authorised by law.

SANZ's disclosures of personal information to third parties are made on a confidential basis or otherwise in accordance with law. SANZ may also disclose personal information with an individual's consent or if disclosure is required or authorised by law. As SANZ is committed to protecting the privacy of individuals, we will view unauthorised disclosure or access to personal information by our employees, contractors or agents as a serious breach of this policy.

Appropriate action (which may include disciplinary or legal action) will be taken in such cases.

## Overseas disclosure

SANZ may disclose personal information to overseas recipients in order to provide its services and for administrative, data storage (e.g. cloud service providers), or other business management purposes. Recipients of such disclosures are located in the United States, New Zealand and Scotland but may also be located in other countries. Overseas recipients may have

different privacy and data protection standards. However, before disclosing any personal information to an overseas recipient, SANZ will take reasonable steps in the circumstances to ensure the overseas recipient complies with the Australian Privacy Principles or is bound by a substantially similar privacy scheme, unless an individual consents to the overseas disclosure or it is otherwise required or permitted by law. If an individual has any queries or objections to such disclosures, please contact SANZ's Privacy Compliance Officer (details below).

## Direct Marketing

SANZ may use and disclose personal information in order to inform an individual of services that may be of interest. In the event an individual does not wish to receive such communications, that individual can opt-out by contacting SANZ via the contact details set out below or through any opt-out mechanism contained in a marketing communication.

### Security of personal information

SANZ takes reasonable steps to ensure that the personal information it holds is protected from misuse, interference and loss and from unauthorised access, modification or disclosure. SANZ holds personal information in both hard copy and electronic forms in secure databases on secure premises, accessible only by authorised staff, SANZ will destroy or de-identify personal information in circumstances where it is no longer required, unless SANZ is otherwise required or authorised by law to retain the information.

## How to access and correct an individual's personal information

SANZ takes steps reasonable in the circumstances to ensure personal information it holds is accurate, up-to-date, complete, relevant and not misleading. Under the Act, an individual has a right to access and seek correction of that individual's personal information that is collected and held by SANZ. If at any time an individual would like to access or correct the personal information that SANZ holds about that individual or more information on SANZ's approach to privacy is sought, please contact SANZ's Privacy Compliance Officer on the details set out below. SANZ will grant access to the extent required or authorised by the Act or other law and take steps reasonable in the circumstances to correct personal information where necessary and appropriate. To obtain access to an individual's personal information:

- That individual will need 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; and
- SANZ requests that the individual is reasonably specific about the information required.

If SANZ refuses a request to access or correct personal information, SANZ will provide written reasons for the refusal and details of complaint mechanisms. SANZ will also take steps reasonable in the circumstance to provide access in a manner that meets the individual's needs and the needs of SANZ. SANZ will endeavor to respond to requests to access or correct personal information within 30 days from the date of the request.

## How to contact us

For further information or enquiries regarding personal information, or if an individual would like to opt-out of receiving any promotional or marketing communications, please contact SANZ's

## PRIVACY COMPLIANCE OFFICER

To contact the Privacy Compliance Officer: [info@soulcraftanz.com](mailto:info@soulcraftanz.com)

## PRIVACY COMPLAINTS

Please direct all privacy complaints to SANZ's Privacy Compliance Officer. At all times, privacy complaints:

- will be treated seriously;
- will be dealt with promptly;
- will be dealt with in a confidential manner; and
- will not affect existing obligations or affect the commercial arrangements between an individual and SANZ.

SANZ's Privacy Compliance Officer will commence an investigation into each complaint. The individual concerned will be informed of the outcome of the complaint following completion of the investigation. In the event that an individual is dissatisfied with the outcome of the complaint, it can be referred to the Office of the Australian Information Commissioner.

## AVAILABILITY AND REVIEW OF POLICY

SANZ will make its policy available on request and will provide access to this policy on our website. This policy may be amended from time to time at the discretion of SANZ.