

# NTAQ PRIVACY POLICY

Last updated: 27 August 2019

## INTRODUCTION: Scope of Policy

This policy applies to National Trust of Australia (Queensland) including Currumbin Wildlife Sanctuary Pty Ltd (**NTAQ, we, us, our**) and any website we operate including [www.currumbinsanctuary.com.au](http://www.currumbinsanctuary.com.au) and [www.nationaltrust.org.au/qld](http://www.nationaltrust.org.au/qld) (**our websites**).

At times it is necessary to gather information from our customers, volunteers and other parties with whom we deal to enable us to improve the experience we provide. The types of Personal Information NTAQ collects are dependent on our interactions with you. NTAQ understands customer concerns about confidentiality and so takes the utmost care with all information obtained. We have implemented this policy to ensure compliance with the Privacy Act 1988 (CT) and the Australian Privacy Principles (**APPs**). This Policy outlines the types of Personal Information that NTAQ usually collect, the purposes for which we collect it, to whom we disclose it, how we hold and keep it secure and your rights in relation to your Personal Information, including how to complain and how we deal with complaints. This Policy should be read together with our website terms and conditions <https://currumbinsanctuary.com.au/terms-and-conditions>, <https://www.nationaltrust.org.au/disclaimer/>

## COLLECTION OF PERSONAL INFORMATION

### What Personal Information NTAQ COLLECTS?

**Personal Information** means information or an opinion about you, whether true or not, from which your identity is apparent or can reasonably be ascertained, or as otherwise defined by applicable privacy law. This is whether the information is recorded in a material format or not. Personal Information may also include information we may collect about your individual preferences. It does not include information that is de-identified (anonymous data).

NTAQ usually collects Personal Information from visitors, clients, members, employees, job applicants, volunteers, sponsors, donors, and partners, and we may also collect information from suppliers and other parties we deal with (collectively **you, your**).

The types of Personal Information we collect depends on the dealings you have with us, and may include you're:

- name
- date of birth
- gender
- address (postal and email)
- telephone numbers
- country of residence
- financial information (including credit card details)
- other information necessary for our functions and activities
- opinion in relation to any of our business activities via surveys and/or competitions and trade promotions
- other such information (including proof of identity) that is relevant for us to provide our products and services to you in the manner that you have requested, or to comply with the law.

If you are applying for or enquiring about employment or volunteering with us, or you are an existing employee or volunteer, we may collect additional information from or about you such as:

- employment history
- qualifications
- results of any profile testing
- results of any pre-employment testing
- details of your referees
- information provided by your referees
- identity documents
- details of your next of kin or emergency contact

## How NTAQ collects Personal Information

Personal Information may be collected about you via the following means:

- directly from you when you provide your details to us;
- from you indirectly through a transaction or request for membership or tickets or other services we offer, donations, emails, forms, competition entries, face-to-face meetings, interviews, surveys, registration and attendance at events, business cards, online queries and telephone conversations, via a contract we have with you, via CCTV footage and photographs, and through use of the services available through our websites, applications and social media channels;
- when you apply for a job or volunteer position with us;
- when you apply to us or enquire about being a sponsor or partner;
- information collected from third parties in some instances, for example, we may use third parties to analyse traffic at our website, our blogs and social media channels, which may involve the use of cookies, or we may collect an employment reference from another person.

Where it is lawful and practicable to do so, you may deal with NTAQ anonymously (e.g., when enquiring about NTAQ services generally). However, we usually need your name, contact information and other details to enable us to provide our services or products to you.

## Why NTAQ collects Personal Information and how do we use it

NTAQ will only collect Personal Information from you when it is reasonably necessary to undertake our business activities and functions, or as otherwise permitted by law. We may also collect your Personal Information for one or more of the following purposes:

- to gain an understanding of your needs so we may provide you with the required services
- to provide, process and administer tickets, passes, memberships or other goods and services to you
- to contact you about orders and bookings, or your requests, questions, comments and complaints
- to process your donation and provide you with a tax receipt
- to enable use to raise funds, such as through direct fundraising, memberships, sponsorships, and bequests
- to analyse our services and customer needs with a view to developing new and/or improved services
- for surveys, direct marketing, promotions, competitions and/or events
- to ensure the proper function of the website and online software
- for our marketing, planning, product development and research requirements
- for the promotion of NTAQ and/or third-party partners
- to administer and manage our services including charging, billing and collecting debts
- to distribute our newsletters and other communications, either directly or using a third-party service
- to notify you about special offers and products or services available from us or our participating partners, either directly or via a third-party advertising platform
- to assess your application for a role with us and to take references

- to respond to and manage claims, defend our legal interests and investigate and protect against fraud, theft and other illegal activities
- fulfilling any mandatory reporting obligations required by applicable law, including communicating with you if a notifiable data breach has occurred in relation to your Personal Information
- any purpose for which you have consented
- any related secondary purpose which we believe you would reasonably expect when we collected your Personal Information or as a result of our ongoing relationship with you

We may also use your Personal Information for other purposes not listed above which will be made clear to you at the time we collect your Personal Information, or for such purposes as may be required or permitted by law.

### Disclosure of Personal Information

Generally only officers, employees or contractors of NTAQ may view or use your Personal Information. We will not sell, distribute, rent, licence, disclose or reveal, share or pass your Personal Information on to any third parties, other than in accordance with this privacy policy, and to those who are contracted to us to keep Personal Information confidential. From time to time, NTAQ may disclose Personal Information:

- to our related bodies corporate, suppliers, consultants, contractors, branch directors or agents so that they can provide you with products or services on our behalf or help us to provide you with the requested goods or services including contacting you in relation to the products or services
- if we merge with or are acquired by another entity, to that entity as a part of the merger or acquisition
- if you are an employee or volunteer, to our insurer as part of any workplace health and safety event or claim
- if NTAQ believes that the disclosure may lessen a risk of harm to the health or safety of any person
- if NTAQ believes an unlawful activity is being undertaken and the Personal Information is disclosed as part of NTAQ's investigation into this activity
- to relevant federal, state and territory authorities, where we are required to by law.

### 'Sensitive information'

NTAQ will not ask you for information revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, or details of health, disability or sexual activity or orientation, unless:

- the collection of that information is specifically authorised by law; or
- the collection of the information is necessary for the establishment, exercise or defence of a legal claim, or
- the collection of the information is necessary for a particular activity that requires a minimum standard of physical fitness or mobility.

### 'Financial information'

NTAQ may collect your credit card details or other financial information where you provide them to us via our website for the purpose of purchasing goods or services from us. We will only use your financial information for the purpose for which it was collected and in accordance with this privacy policy. Financial or credit card information we collect from you is strictly confidential and held on secure servers in controlled facilities.

## Use of our website and online software

Every time you use our website, information may be collected by us or on our behalf via services such as Google Analytics. Types of information collected may include:

- the date and time of your visit to our website and online software
- your IP address
- the address of the documents you access
- the type of browser and operating system you are using
- any address of a recurring site and any other website you are about to visit
- the information you submit regarding payment particulars

The information that may be collected provides us with details about how the website is being used including the frequency and duration of visits, and which web pages you have accessed on the website.

We may provide third parties with aggregate statistics about our visitors, traffic patterns and related site information. This data reflects site-usage and does not contain identifying information.

## Cookies

Most commercial websites use cookies. Cookies are data that a website transfers to your browser and are stored in your hard drive and are be used to track your ongoing access to and use of the website. We may use cookies to allow us to track usage patterns and help us improve and tailor our service to you. Cookies are used to 'remember' when your computer or device accesses our website. Cookies are essential for the effective operation of our website and to help you interact with us online. They are also used to tailor the products and services offered and advertised to you, both on our website and elsewhere. Cookies will not identify you personally. If you would prefer not to receive cookies, you can alter your security settings on your web browser to disable cookies or to warn you when cookies are being used. However, this may mean you may not be able to take advantage of all features of the website.

## Third party advertising services

We may utilise certain third-party advertising services (e.g., organizations such as FastClick or Google) to display advertising for our advertisers. These third-party services may place a cookie on your computer for the purposes of ad tracking and presentation. We do not share personally identifiable visitor information with these third-party services.

## Minors

We may collect Personal Information about children under the age of 16 (minors) as part of our business, for example selling family memberships or tickets. Where we collect Personal Information about minors, we have adopted the position proposed by the Privacy Commissioner that a young person is able to give their consent when he or she has a sufficient understanding and maturity to understand what is being proposed. When obtaining Personal Information from minors, NTAQ will make a determination as to the minor's understanding of why the Personal Information is being collected, before deciding to collect that information. Where a minor is not able to give their consent to the collection of their Personal Information, their parent and/or guardian may provide their Personal Information to us and in doing so gives consent to us collecting that Personal Information.

## DISCLOSURE AND SECURITY OF PERSONAL INFORMATION

### International transfers

NTAQ may disclose Personal Information to organisations outside Australia. NTAQ will only do so where the foreign country has a substantially similar privacy regime to Australia or where the overseas organisation has agreed to comply with the Privacy Act.

### Storage and Security

We take all reasonable and appropriate steps (including organisational and technological measures) to protect your Personal Information from misuse, interference and loss, as well as unauthorised access, modification or disclosure. Some of the ways this is done include:

- requiring our staff to maintain confidentiality
- implementing document storage security
- imposing security measures for access to our computer systems
- providing a secure environment and access control for confidential information

Where we store your Personal Information depends on what interaction you have had with us. These include:

- electronic data which is stored wherever practical under password protection and encryption including:
  - website ecommerce software; and
  - membership database software; and
  - electronic databases, including those for processing customer enquiries or feedback; and
  - email databases for marketing communications.
- physical data, such as paper-based forms, which are stored wherever practical under locked security.

National Trust of Australia (Queensland) stores information in web-based systems provided by contracted third party service providers, these third parties are not permitted to access or use any personal information that is provided.

Where possible and practical, NTAQ will endeavour to comply with recognised Australian and international standards relating to information security. NTAQ regularly deletes and de-identifies Personal Information if the information is no longer needed by NTAQ.

### Data breaches

The Privacy Act requires us to notify affected individuals and the Privacy Commissioner about 'eligible data breaches'. An eligible data breach occurs when the following criteria are met:

- (a) there is unauthorised access to or disclosure of Personal Information we hold (or information is lost in circumstances where unauthorised access or disclosure is likely to occur);
- (b) the access, disclosure or loss is likely to result in serious harm to one or more people; and
- (c) we are unable to prevent the likely risk of serious harm with remedial action.

If it is not clear whether a suspected data breach meets these criteria, we will investigate and assess the breach to determine whether the breach is an 'eligible data breach' that requires us to notify the affected individuals. This is to ensure that you are notified if your Personal Information is involved in a data breach that is likely to

result in serious harm. Even if the criteria are not met, we may decide it appropriate to notify you anyway as part of our commitment to taking privacy seriously.

### Direct marketing

We may use your Personal Information for direct marketing purposes with your consent, or where we reasonably believe you would expect to hear from us (for example, to tell you about new products or services and special offers that we believe may be of interest to you, or about an event in your local area).

You can withdraw your consent to receiving direct marketing communications from us at any time by unsubscribing from the mailing list by clicking 'unsubscribe' at the bottom of any email from us, by contacting us on the details at the end of the privacy policy or by using the unsubscribe facility set out in any other electronic communication you receive.

We may occasionally engage other companies to provide marketing or advertising services on our behalf. Those companies will be permitted to obtain only the Personal Information they need to deliver the service. If we provide those companies with any of your Personal Information, it is to provide you with a better or more relevant and personalised experience and to improve the quality of those services. We take reasonable steps to ensure that these organisations are bound by confidentiality and privacy obligations in relation to the protection of your Personal Information.

We may also use your Personal Information and information collected about you using third parties such as Google Analytics to provide you with a better or more personalised and relevant experience when using our website. We may do this by combining behavioural data we collect by the use of cookies and combining it with the Personal Information we have collected from you.

## **ACCESS TO AND CORRECTION OF YOUR PERSONAL INFORMATION**

Subject to the exceptions set out in the Privacy Act, you may seek access to and correction of the personal information which we hold about you by contacting the NTAQ Privacy Officer on details provided below. Any request to provide access to this information will be dealt with within a reasonable time. We will require you to verify your identity and to specify what information you require. If a fee is charged for providing access, you will be advised of the likely cost in advance.

If NTAQ withholds access to Personal Information, NTAQ will provide written reasons to the extent required and how the Customer may complain about the refusal. Alternatively, NTAQ will consider whether the provision of access to an independent third party will meet NTAQ's and the relevant Customer's needs.

### Updating Personal Information

NTAQ regularly monitors the quality and accuracy of Personal Information that it maintains and where practical, updates that information on a regular basis. You may update, amend or correct your Personal Information at any time by contacting NTAQ's Privacy Officer on the details set out in this privacy policy. We will need to verify your identity.

## **CONTACTING OUR PRIVACY OFFICER**

NTAQ is committed to resolve any issues, complaints or concerns about privacy and use of data. If you have a question or comment regarding this Policy or wish to make a complaint or exercise your privacy rights, please contact our Privacy Officer on the following details:

**Phone:** +61 (07) 5534 1266

**Post:** 28 Tomewin Street, Currumbin, Queensland 4223

Attn: Privacy Officer

**E-mail:** [privacy@nationaltrustqld.org](mailto:privacy@nationaltrustqld.org)

We will need to verify your identity and we will respond to you within a reasonable period of time to acknowledge your complaint and inform you of the next steps we will take in dealing with your complaint.

If you are not satisfied with our response, you may complain to the Office of the Australian Information Commissioner (**OAIC**) via the OAIC website: [www.oaic.gov.au](http://www.oaic.gov.au).

## **CHANGES TO OUR PRIVACY POLICY**

We may revise this privacy policy from time to time as we add new features or as laws change that may affect our website. When we make changes to our privacy policy, they are reflected on this page. Any revised privacy policy will apply both to information we already have about you at the time of the change, and any Personal Information created or received after the change takes effect. We encourage you to periodically reread this privacy policy, to see if there have been any changes to our policies that may affect you.