



**THE SOVEREIGN HILL MUSEUMS
ASSOCIATION**

“PRIVACY POLICY”

PRIVACY POLICY			
Document Owner: People and Performance			
Current version implemented: November 2015			
Date of next review: 2019			
Revision	Reviewed by	Authorised by	Date
Original Issue	Mark Karlovic	SHMA Executive Team	Nov 2015

CONTENTS

1. INTRODUCTION	2
2. PURPOSE	2
3. SCOPE	2
4. DEFINITIONS	2
5. RESPONSIBILITIES	2
6. POLICY PRINCIPLES	3
7. ASSOCIATED DOCUMENTS	7
8. REFERENCES	7
9. DISTRIBUTION	8

PRIVACY POLICY

1. INTRODUCTION

1. **Respect for your privacy**

The Sovereign Hill Museums Association ('Sovereign Hill') is committed to protecting your right to privacy, especially in regard to personal information. This Privacy Policy explains how we handle your personal information.

Under the law, your rights to privacy are also protected. Our Policy is consistent with legal requirements.

2. PURPOSE

The purpose of this policy is to enable SHMA visitors to:

- recognise what are the SHMA privacy obligations;
- understand our obligations in relation to privacy;
- understand the serious consequences of a failure to observe our privacy obligations.

SHMA may amend and vary this policy from time to time.

3. SCOPE

This policy applies to all visitors, employees, volunteers, contractors, associates.

4. DEFINITIONS

"SHMA" means The Sovereign Hill Museums Association and Association refers to the same.

"Executive Team" means the SHMA Chief Executive Officer and the employed Directors/Curators.

"Supervisor and Manager" in this procedure covers any employee of the Association who plans, organizes or supervises the activities of other employees, volunteers, contractors or visitors on behalf of the Association.

"Visitors, Employees, Volunteers, Associates and Contractors" in this procedure covers any Visitor, employee, volunteer, contractor, associate.

5. RESPONSIBILITIES

The **SHMA Executive Team and SHMA Privacy Officer** is responsible for the implementation of this policy and the development of appropriate reviews for privacy compliance across the organisation.

Managers and Supervisors must comply with this policy and inform their staff and volunteers of this policy and implement it, including during staff induction.

Staff, Volunteers and Contractors must cooperate with this policy and inform management of any breaches of this policy.

The **People and Performance Manager** is responsible for the maintenance of this policy.

6. POLICY PRINCIPLES

6.1 What is Personal Information?

- 6.2 Personal information includes information or an opinion about an identified individual, or an individual who can be reasonably identified from the information. The information or opinion will still be personal information whether or not it is true and whether or not we have kept a record of it.
- 6.3 Personal information collected by Sovereign Hill is treated as confidential and is protected by the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth).

7. What personal information do we collect and how do we collect it?

- 7.1 In order to conduct our operations, it is necessary for Sovereign Hill to collect certain information. This may include details such as your name, address, phone number, fax, email address, and credit card number. We collect this information directly from you by:
- if you pay entrance fees, book accommodation or purchase our goods and services using a personal credit card;
 - if you shop online with us;
 - if you make bookings to attend Sovereign Hill or other services offered, such as the Sound and Light Show, the Costumed Schools Program, Narmbool or other education programs;
 - if you raise an issue about your experience at Sovereign Hill or about our goods and services
 - If you opt in (for any of our mailing lists)
 - If you apply and become a member of Sovereign Hill Museums Association;

- If you become a supplier or contractor to our Association;
- If you make a Tax-Deductible Donation to Sovereign Hill Museums Association

7.2 We may also seek on occasion your opinions about our organisation. Whilst voluntary and in most cases provided anonymously, you have the option of providing information that identifies you.

8. How we use and disclose your personal information

8.1 The contact details we obtain from you are essential in order to facilitate the provision of goods and services that you have requested as a customer. We may subsequently use these contact details to keep you informed about changes or developments occurring in our museum. However we respect your right to elect not to receive this material.

8.2 Information we collect containing your opinions about our organisation assists Sovereign Hill to ensure a high level of customer service and quality of presentation is maintained.

8.3 We only use your personal information for the purpose for which it was given to us or for purposes that are directly related to one of our functions or activities.

8.4 We may also use your personal information for another purpose:

- where you have consented to that use (that consent may be written, verbal or implied from your conduct); or
- you would reasonably expect the information to be used or disclosed for a related secondary purpose.

8.5 The law may also sometimes require us to disclose personal information, such as disclosure to a court where the information is subject to a subpoena.

8.6 Our website is operated and maintained by Sovereign Hill. When visiting the site, a record of your visit is logged. Information is recorded for statistical purposes and is used by Sovereign Hill to help improve the site. The following information is supplied by your browser:

- (a) the user's server address;
- (b) the user's operating system (for example, Windows, Mac, etc);
- (c) the user's top level domain name (for example, .com, .gov, .au, etc);
- (d) the date and time of the visit to the site;
- (e) the pages accessed and the documents downloaded;
- (f) the previous site visitors;

(g) the type of browser used.

8.7 No attempt will be made to identify users or their browsing activities except in the unlikely event of an investigation, where a law enforcement agency may exercise a warrant to inspect the Internet Service Providers' logs.

Email communications

8.8 When you email us or submit your information:

- (a) we will record your email address;
- (b) we will only use your email address for the purpose for which you provided it;
- (c) it will not be added to a mailing list;
- (d) we will not use your email address for any other purpose; and
- (e) we will not disclose it without your consent except where Sovereign Hill may be required by law to disclose certain information.

Cookies

8.9 A cookie is a text string that is included with Hypertext Transfer Protocol (HTTP) requests and responses. Cookies are used to maintain state information as you navigate different pages on a web site or return to the web site at a later time. Cookies cannot be used to execute code (run programs) or deliver viruses to your computer.

Persistent vs. Session Cookies

8.10 Cookies are either stored in memory (session cookies) or placed on your hard disk (persistent cookies). Sovereign Hill does not use persistent cookies.

How to Access Cookies Settings in your Browser

8.11 You have the ability to enable or disable cookies. Note that disabling cookies may prevent some web services from working correctly, and disabling cookies does not make you anonymous or prevent web sites from tracking your browsing habits. HTTP requests still include information about where you came from (HTTP Referrer), your IP address, browser version, operating system, and other information (see Site Visit Data above).

Postings on social media

8.12 We may communicate with you via social media. If you post relevant feedback or pictures, we may decide that we would like to share the content with other social media users. Unless already shared publicly, no such content will be shared with other users before we have both requested and obtained your permission to share your post.

9. Direct marketing

- 9.1 We may on occasion disclose personal information that we hold to advertising or marketing agencies, for the purposes of direct marketing.
- 9.2 We will only provide your personal information to another entity for the purposes of direct marketing where you have specifically elected to "opt out" to receive such information, when completing one of our relevant forms.

10. Ensuring your personal information is up-to-date

- 10.1 We rely on the accuracy of the personal information we collect in conducting our business. It is important for us that the information is accurate, up-to-date and complete.
- 10.2 We take reasonable measures to ensure that the personal information we hold is accurate, up-to-date and complete. This includes updating personal information when we are advised by individuals that their personal information has changed. If you find that information we hold about you is incorrect, please contact us through our Privacy Officer (as set out at the end of this Policy) and we will take reasonable steps to correct it.

11. Consequences of not providing your personal information

- 11.1 If you do not provide your personal information to us, we may not be able to provide you with the service or feedback you would like to have. In addition, we will not be able to let you know about other products that you might be interested in.

12. Accessing your personal information

- 12.1 We will, at your request, provide you with access to the personal information we hold about you, subject to some exceptions permitted under the Privacy Act. We might decline to provide access to this information to you where this is considered to be appropriate, such as where the request for access is frivolous or vexatious or relates to anticipated legal proceedings.
- 12.2 If, where you provide us with a written request indicating that the information held is inaccurate, out of date or incomplete, then we will amend the information to ensure that it is accurate, up-to-date and complete.
- 12.3 We could charge you an access fee, in order to cover the reasonable costs of retrieving this information and providing it to you.

13. Protecting your personal information

- 13.1 We take steps to ensure that your personal information held is protected from misuse, interference and loss and from unauthorised access, modification or disclosure.

- 13.2 Your personal information may be held in either or both hard copy and/or electronic form in secure databases that are accessible only by authorised staff. We take steps to maintain physical security over records held in hard copy form.
- 13.3 Where your personal information is no longer required, we also take reasonable steps to ensure that it is destroyed or permanently de-identified (unless the retention of this information is required or authorised by law).

14. Changing this policy

- 14.1 We may change this policy from time-to-time. Amendments in the law and developments in technology mean that practices will need to change. Any updated privacy policy will be made available on our website (www.sovereignhill.com.au) or otherwise on request.

15. Contacting us or resolving your privacy concerns

- 15.1 If you wish to contact us to obtain further information or have any privacy concerns, please contact us as follows:

Privacy Officer
C/- Sovereign Hill Post Office
Ballarat
VIC 3350
Phone: (03) 5331 1944

7. ASSOCIATED DOCUMENTS

SHMA Code of Conduct
SHMA Telephone & Mobile Phone Usage Policy
SHMA Internet, Email and Computer Use Policy
SHMA Disciplinary Procedure
SHMA Privacy Policy
SHMA Social Media Policy

8. REFERENCES

Privacy Act 1988 (Cth)

9. DISTRIBUTION

This document will be distributed via:

1. The Sovereign Hill website, intranet and shared S Drive;
2. Staff Meetings;
3. Notification in the weekly staff newsletter;
4. Other information forums as deemed appropriate

The Privacy Policy is endorsed by:

Name: Jeremy Johnson
Chief Executive Officer

Signature: Jeremy Johnson

Date: