




Privacy Policy

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Signature:	
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Related Documents:	

1. Introduction

The purpose of this Privacy Policy (the **Policy**) is, in the absence of any legal obligation to do so, to formally record and state the position of the Centennial Park Cemetery Authority (**Centennial Park**) in relation to the collection, use, storage, disclosure and maintenance of personal information.

Accordingly, this Policy outlines the approach of Centennial Park to the receipt and management of personal information for the purposes of ensuring the protection of privacy.

2. Policy

Given the nature of the services provided, Centennial Park is committed to:

- protecting an individual's right to privacy in relation to the collection, management, storage, use and disclosure of their personal information; and
- ensuring the accuracy and security of any personal information it holds.

All personal information collected by Centennial Park will be used only for the purposes of conducting its business, including in the provision of services to stakeholders and clients.

This Policy applies to all persons who may have previously provided or who do in the future provide, personal information to Centennial Park, or for whom Centennial Park may hold personal information. The Policy does not apply to information or records that are publicly available.

2.1. Legislative Framework

Centennial Park is not, as a matter of law, bound by the *Privacy Act 1998* (Cth) (Privacy Act), or by the *Information Privacy Principles Instruction* contained in Premier and Cabinet Circular 12 (the Privacy Principles).

However, in collecting, using, storing and disclosing personal information, Centennial Park acknowledges that the National Privacy Principles contained within the Privacy Act, as well as under the Privacy Principles, set an appropriate standard for privacy protection of personal information.

This Policy is intended to achieve 'best practice' consistency with those standards.

Centennial Park also recognises and acknowledges, that there will be occasions when other legislative requirements may require personal information to be included in public documents.

For example, the *Freedom of Information Act 1991* provides for public access to official documents and records.

2.2. Collection of Personal Information

Centennial Park collects personal information in order to provide clients with services, including burial, crematorium and memorial services.

The type of personal information that is collected and held will depend on the services provided and may include, but is not limited to:

- name;
- residential address;
- email address;
- contact telephone number; and
- credit card or bank account details.

Centennial Park may also collect sensitive information about its clients and/or a deceased individual for whom it provides a service, to enable it to provide clients with tailored services for loved ones or family members.

This may include, where reasonable, appropriate and necessary, information in relation to:

- religion;
- gender;
- membership of a body of group; and/or
- nationality.

2.3. Collection of Personal information

Centennial Park will usually collect personal information directly from a client, which may occur when clients:

- speak with an employee of Centennial Park in person or by telephone;
- speak with a representatives or agents in person or by telephone;
- send hard copy documents to the Office; and/or
- interact with representatives or agents of Centennial Park online, for example, through member login portals or the online store.

Clients have the right to refuse to provide personal information. However, in doing so, this may result in Centennial Park being unable to provide services, or it may limit the type or nature of the services able to be provided.

Personal information may also be collected from third parties, such as family members, funeral homes, hospitals or nursing homes.

2.4. Storage of Personal Information

Centennial Park will take all reasonable steps to protect the personal information it holds, in both physical and/or electronic form, from loss, unauthorised access, use, modification, disclosure or other misuse and will maintain systems to ensure that all personal information collected is up to date, accurate and complete.

In doing so, Centennial Park has in place, computer software and hardware, including electronic protection that prevents access to personal information from unauthorised persons.

Electronic protection includes:

- mandatory password protection on computers; and
- firewall and antivirus software.

Centennial Park also has in place documented record management procedures in relation to the collection, physical security and storage of hard copy records.

If a client provides credit card information online, the information is securely encrypted using best available current technologies.

Although no method of transmission over the internet or electronic storage can ever be considered 100% secure, Centennial Park does follow all PCI-DSS requirements and implements additional accepted industry standards.

2.5. Use and Disclosure of Personal Information

Personal information is used to provide services such as:

- conducting funeral services, memorial services or wakes;
- arranging for burials or cremations; and
- organising ashes memorial positions or burial memorial positions.

The primary purpose for using or disclosing personal information will include:

- to identify clients and verify identity;
- to provide services to clients and their family; and
- to communicate with clients.

Centennial Park may also disclose personal information in the good faith belief that such action is necessary to:

- comply with a legal obligation, such as a subpoena or otherwise in accordance with legislation;
- protect or defend the rights or property of Centennial Park;
- prevent or investigate a possible wrongdoing in connection with services;
- protect the personal safety of users of services or the public; and
- to protect against legal liability.

2.6. Direct Marketing

Centennial Park may, on occasion and where reasonable and appropriate, use personal information in providing directing marketing information to individuals.

Direct marketing may occur via email, social media, SMS or telephone.

Where direct marketing is transmitted electronically or by telephone, Centennial Park will at all times comply with any applicable laws including the *Spam Act 2003* (Cth), *Spam Regulations 2021* (Cth) and the *Do Not Call Register Act 2006* (Cth).

Direct marketing will ordinarily be directed to:

- Interment Right Holders and Authorised Persons; and
- subscribers to the e-newsletter *Parklife* or social media platforms.

2.7. Accessing Personal Information

Clients may request access to, or seek a correction of, personal information held by Centennial Park.

Any such request must be made in writing.

Whilst access will ordinarily be facilitated for an individual to their personal information, there may be exceptions to providing access.

Exceptions include where:

- providing access would have an unreasonable impact on the privacy of other/another individual(s);
- the request for access is frivolous, vexatious or without merit; or
- access would be unlawful.

Centennial Park reserves the right to charge a reasonable fee for providing access to personal information, but will not charge persons for making an application for access to, or to correct, personal information.

If a request for access or correction is denied, Centennial Park will, within a reasonable timeframe, provide reasons in writing as to why the request was refused.

2.8. Service Providers

Centennial Park may employ third party companies or individuals to facilitate or provide services on its behalf.

These third parties have access to personal information solely for the purposes of performing these tasks on behalf of Centennial Park. Those third parties will be advised of this Policy and their obligations to comply with it meaning that they too are, equally, obliged to not disclose or use the information for any other purpose.

2.9. Changes to this Policy

The Policy may be amended at any time.

2.10. Questions or Complaints

If you have any questions regarding this Policy, or if you believe there has been a breach of the same, please contact Centennial Park at:

privacy@centpark.org.au

or by mail at:

Privacy Enquiries
Centennial Park Cemetery
760 Goodwood Road, PASADENA SA 5042, Australia

3. Definitions

Information and Records:	Information in electronic or hard copy form, including images and databases.
PCI-DSS:	Payment Card Industry Data Security Standard is a set of security standards that outline requirements for the secure management of credit card data.
Personal Information:	Information that identifies a particular individual. A person does not have to be mentioned by name for information to be considered personal information. A record or information will contain personal information if an individual can be identified from the record or information and can include information and opinions, regardless of whether the information is true or not. But does not include information that is:

- publicly available publications;
- material kept in public records and archives such as the Commonwealth or State archives; or
- anything kept in a library, art gallery or museum for the purpose of reference, study or, exhibition.

Sensitive Information:

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 orientation or practices;
- criminal record;
- health;
- genetics; and
- biometrics.

4. Roles and Responsibilities

4.1. Managers and Supervisors

Managers and Supervisors are responsible for:

- supporting the successful implementation of this Policy within their department/section/area;
- ensuring employees in their department are aware of, and observe, Centennial Park's expectations of employee conduct.

4.2. Team Members/Staff

Team members/staff are responsible for:

- familiarising themselves with the requirements of the Policy;
- ensuring they access current versions of the Policy from the intranet when referencing content, and taking responsibility for managing/destroying any uncontrolled hard copies.

4.3 Deviation

Deviations from the Policy must be authorised by the CEO, and any such deviation recorded and reported to the Centennial Park Board.