



Privacy Policy

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Approved by:	CEO Janet Miller
Signature:	

Electronic version on the Authority Intranet is the controlled version.

Printed copies are considered uncontrolled.

Before using a printed copy, verify that it is the current version.

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1 Purpose

The purpose of this privacy policy is to inform our customers and visitors of the manner in which we collect, use, store and maintain personal information.

2 Scope

A person whose personal information may be given to or held by us

3 Content

Given the nature of the services we provide, Centennial Park ABN 27 653 594 433 is committed to:

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

Centennial Park is technically not an organisation covered by the *Privacy Act 1998 (Cth)* (Privacy Act). However, Centennial Park is committed to ensuring best practice in all respects, including privacy. This privacy policy is therefore compliant with the Australian Privacy Principles in the Privacy Act.

4 Definitions

What is "information" or a "record"?

"Information" and "records" are information in electronic or hard copy form. They include pictures and databases. However, this policy does not apply to information or records that are publicly available.

What is "personal information"?

"Personal information" is information that identifies a particular individual. A person does not have to be mentioned by name for information to be "personal information".

A record or information will contain personal information if an individual can be "reasonably identified" from the record or information.

Personal information can include information and opinions, regardless of whether the information is true or not.

What is "sensitive information"?

"Sensitive information" is an important type of personal information. Sensitive information is personal information relating to 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;

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- membership of a trade union;
- sexual orientation or practices;
- criminal record;
- health;
- genetics; and
- biometrics.

Collection of Personal Information

We collect personal information in order to provide our clients with our services including burial, crematorium and memorial services.

The types of personal information we collect may include but is not limited to your:

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

We may also collect sensitive information about you and/or a deceased individual for whom we provide a service, to enable us to provide you with tailored services for your loved one or family member.

This may include where appropriate and necessary information relating to a loved ones':

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

How do we collect your personal information?

Generally, we collect personal information directly from you. This may occur when you:

- speak with us in person or over the telephone;
- speak with our representatives or agents in person or over the telephone;
- send hard copy documents to our office; and/or
- interact with us online, for example, through our member login or through our online store.

You have the right to refuse to provide personal information to us.

However, if you exercise this right of refusal, we may be unable to provide you with our services, or it may limit the type or nature of the services we are able to provide to you.

We may also collect your personal information from third parties such as family members, funeral homes, hospitals or nursing homes.

How do we store your personal information?

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We hold personal information in physical and/or electronic form.

We will take reasonable steps to protect personal information we hold from:

- misuse, interference and loss; and
- from unauthorised access, modification or disclosure.

We have in place computer software and hardware that provides electronic protection of and/or prevents access to personal information from unauthorised persons, particularly from those individuals who are external to us.

Electronic protection will include:

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

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

If you provide us with your credit card information through our online store, the information is securely encrypted using current technologies.

Although no method of transmission over the Internet or electronic storage is 100% secure, we follow all PCI-DSS requirements and implement additional generally accepted industry standards.

Use and Disclosure of Personal Information

We use your personal information predominantly to provide you with our services such as:

- conducting funerals;
- arranging for burial or cremation;
- organising memorials; and
- managing burial sites.

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

- to identify you and verify your identity;
- to provide services to you and your family; and
- to communicate with you.

Although this does not occur frequently, it may be that we also disclose your personal information where we are legally compelled to do so, such as in the case of a lawful subpoena.

Direct Marketing

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

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Direct marketing may occur via mail, email, SMS or telephone.

Where direct marketing is transmitted electronically or by telephone, we will at all times comply with any applicable laws including the *Spam Act 2003* (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 our e-newsletter Parklife.

Accessing your personal information

You may request access to, or seek a correction to, personal information we hold about you.

Any such request must be made in writing.

We will ordinarily give an individual access to their personal information unless an exception applies.

Exceptions include where:

- giving access would have an unreasonable impact on the privacy of other individuals;
- the request for access is frivolous or vexatious; or
- the access would be unlawful.

We reserve the right to charge a reasonable fee for providing access to the personal information, but not for making the application or correcting personal information held by us. We may withhold access to the personal information until the fee is paid.

If a request for access or correction is denied we will, within a reasonable time period, provide you with a general, written explanation as to why the request was refused.

Changes to this Privacy Policy

We reserve the right to modify this privacy policy at any time.

Complaints

If you believe we have breached this policy, please contact our privacy officer by email at privacy@centpark.org.au or by mail at:

Privacy Officer
Centennial Park Cemetery
760 Goodwood Road, Pasadena, SA, 5042, Australia

More Information

- If you have any questions or require further information, please contact our Privacy Officer using the contact information above.

5 Roles and Responsibilities

5.1. Managers and Supervisors

Managers and Supervisors are responsible for:

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- Supporting successful implementation of this policy within their department / section /area;
- Ensuring employees in their departments are aware of and observe the Authority's expectations of employee conduct.

5.2. Staff

Staff are responsible for:

- Familiarising themselves with the requirements of this policy;
- Ensuring they always access current versions of this policy from the intranet when referencing content and taking responsibility for managing/destroying any uncontrolled hard copies they choose to print.

6 Deviation

Deviations from this policy must be authorised by the CEO and all deviations recorded and reported to the Board.

7 Compliance

All Policies and Procedures comply with the formatting and definitions contained within 30.0 Governance Statement Policy.

8 Document Control

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Board of Management			31-08-2017
CEO		Janet Miller	07-09-2017
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28-07-2017	Mary-Anne O'Leary	V1.0	New policy developed from legal advice received from HWL Ebsworth
Related documents – (to be read in conjunction with)			
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Operating Policy			1.0
Customer Service Standards & Complaints Handling Policy			3.0
Controlled document location (native)			
TRIM – Governance - Policies			
Controlled document location (published)			
Intranet – Corporate Documents – Corporate Policies			