

Document Title: Privacy Policy

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PRIVACY POLICY

OVERVIEW

We seek to responsibly manage any personal information or health information we handle and are committed to ensuring full compliance with the privacy principles outlined in the Privacy and Data Protection Act 2014 (Vic) for personal information and the Health Records Act 2001 (Vic) for health information. We believe that the responsible handling of personal information is a key aspect of democratic governance, and are strongly committed to protecting an individual's right to privacy.

This Policy is relevant to all GreenSpace Management run facilities. Our Privacy Policy is available on our website or upon request by contacting info@greenspacemanagement.com.au. You may also inquire about the types of personal information we hold about you and how it is managed.

PERSONAL INFORMATION

'Personal information' means information or an opinion about an individual whose identity is obvious, or can reasonably be established, other than certain health or generally available information. We hold personal information on our customers (for example: names and addresses) in order to carry out our services (for example: management, tuition programmes and community services).

SENSITIVE INFORMATION

Sensitive information includes details about racial or ethnic origin, political opinions, religious beliefs, sexual orientation, criminal record, or other similar categories. We will only collect sensitive information with your consent, where required by law, or where necessary for our functions (e.g., for equal opportunity monitoring in community services). It will be handled with additional care in line with the PDP Act.

HEALTH INFORMATION

Health information is managed in accordance with the 11 Health Privacy Principles (HPPs) under the Health Records Act 2001 (Vic). These principles are similar to the IPPs but provide specific protections for health records. Key aspects include stricter rules on collection (only with consent or for health services), use/disclosure (ie; for treatment or research with safeguards), security, and access. If you have questions about health information, contact our Privacy Officer.

COLLECTION OF INFORMATION

We will only collect personal information that is necessary for carrying out our functions and activities. This may include, but not limited to such collection points as our website, payment gateways for green fees and other activities and within our facilities for marketing/promotional activities and providing customers with proof of purchase. When collecting personal information, we will provide you with a collection notice (ie; via our

website forms or in-person) that explains the purpose of collection, how the information will be used or disclosed, your rights to access and correct it, and any consequences of not providing it.

DATA QUALITY

We take reasonable steps to ensure that the personal information we collect, use, or disclose is accurate, complete, up-to-date, and relevant. This includes verifying information at the time of collection and reviewing it periodically as needed for our functions.

USE AND DISCLOSURE

We will only use personal information within our organisation for the purpose for which it was collected or in accordance with the legislation (for example; where you have consented or where it would reasonably expect this to occur) or for a related secondary purpose that you would reasonably expect.

Your email address will be your primary point of contact for GreenSpace Management, however in some instances a phone number is required and we may require this in order to provide you with services and or information.

OPTING OUT OF PROVIDING PERSONAL INFORMATION

If you do not wish to have your Personal Information used or disclosed in a manner described in this Privacy Policy, you can contact us. However, please note that if you do so, you may not be able to access, or use, all or part of our website and our venue.

We may still use or disclose your personal information if: (a) We subsequently notify you of the intended disclosure and you do not object to that use or disclosure; (b) We believe that the use or disclosure is reasonably necessary to assist a law enforcement agency or an agency responsible for government or public security in the performance of their functions; (c) to enforce our terms and conditions; (d) to protect our rights; (e) to protect the safety of members of the public and users of our website and our venue; or (f) We are required by law to disclose the information.

You may, at any time, elect to opt-out of receiving direct marketing and promotional communications by contacting our Privacy Officer in accordance with paragraph 11.1 or by any other simple means to opt-out we provide you. However, please note that some of our services may include a direct marketing and promotional communications feature which cannot be removed and as such you may not be able to access or use some of our website if You elect to opt-out of all direct promotional and marketing communications.

Within our website, you may elect to not receive future updates or notifications by selecting 'Do not send me notification emails' in your user profile 'Account Settings'. You may also elect not to receive future newsletters by selecting 'Do not send me newsletters' in your user profile 'Account Settings'. All notification emails and newsletters provide you with instructions for opting-out of these future communications.

SECURITY OF INFORMATION STORAGE

We always aim to maintain a secure system for storing personal information. Information systems and operational policies and procedures are in place to protect personal information from misuse and loss and from unauthorised modification or disclosure.

TRANSBORDER DATA FLOWS

If we transfer personal information outside Victoria (ie; to international service providers for payment processing or data storage), we will ensure the recipient is subject to privacy protections substantially similar to the IPPs under the PDP Act, or obtain your consent, or take other steps as required by law to protect your information.

USE OF COOKIES

In accessing our website, We may also utilise "cookies" to enable Us to monitor traffic patterns and to serve you more efficiently.

Cookies are small data files which are placed on your computer by web servers when you visit certain websites. Our website uses cookies to allow us to identify regular visitors and collects information about Your usage of the website. A cookie does not identify you personally, but it does identify Your computer. You can set your internet browser to notify you when receive a cookie and this will provide you with an opportunity to either accept or reject it in each instance.

DISPOSAL OF PERSONAL INFORMATION

We will dispose of personal information where it is no longer necessary to fulfil the purposes for which the information was collected or as required by law.

ACCESS AND CORRECTION

If you wish to access your personal information held by us you may contact GreenSpace Management via email info@greenspacemanagement.com.au. Access will be provided except in the circumstances outlined in the legislation, or where the Freedom of Information Act 1982 (Vic) applies.

If you believe that your personal information is inaccurate, incomplete, or out of date, you may request us to correct and update the information. Your request will be dealt with in accordance with the legislation.

ANONYMITY

Where lawful and practicable, we will give you the option of not identifying yourself when supplying information or entering into transactions with us.

UNIQUE IDENTIFIERS

We may assign unique identifiers (such as customer account numbers) to individuals only where reasonably necessary for performing our functions efficiently, such as managing online payments or services. We will not adopt unique identifiers assigned by other organizations unless required by law or with your consent.

EXTERNAL CONTRACTORS

While personal information is usually handled by our staff, we may outsource some functions to 3rd parties.

This may require the contractor to collect, use or disclose certain personal information. This includes payment gateways for online transactions, which are required to handle

personal information securely and in compliance with the PDP Act. Contractors are obliged to comply with the requirements of the legislation in all respects.

COMPLAINTS

If you feel aggrieved by our handling of your personal, you may make a complaint to our Privacy Officer by contacting info@greenspacemanagement.com.au. Your complaint will be investigated as soon as possible (no later than 5 business days) and you will be provided with a written response. If unresolved, you may complain to the Office of the Victorian Information Commissioner (ovic.vic.gov.au).

AUTHORISATION

Name: Peter Vlahandreas

Title: Managing Director

Dated: 10 January 2025

Signature:

