

## **Privacy Policy**

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### **1.0 Introduction**

The All Seasons Sanctuary Golf Resort is committed to protecting and safeguarding the privacy of its employees and to ensuring that personal information collected is handled in accordance with the requirements of the Privacy Amendment (Private Sector) Act 2000 which regulates the way organisations collect, use, hold and disclose employee information.

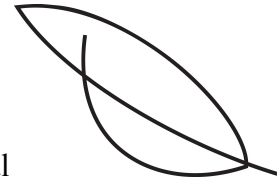
### **2.0 Employee Information**

“Personal information” is defined as information or an opinion about an individual whose identity is apparent, or can reasonably be ascertained from the information or opinion, which could include information such as bank accounts, credit card details, client lists, personal addresses and phone numbers.

“Sensitive information” is defined as information or an opinion about an individual’s racial or ethnic origin, political opinions, membership of a political association, sexual preferences or practices, religious beliefs, criminal record or health information.

### **3.0 Collection and Correction of Information**

The All Seasons Sanctuary Golf Resort will collect employee information in accordance with the relevant provisions of the Privacy Amendment (Private Sector) Act 2000 and will take all reasonable steps to ensure that the employee information it collects is accurate, complete and up-to-date. If The All Seasons Sanctuary Golf Resort is made aware of an error or change in the employee information it has collected, it will use all reasonable endeavours to correct such errors.



#### 4.0 **Use and Disclosure of Employee Information**

The All Seasons Sanctuary Golf Resort may use and/or disclose employee information where:

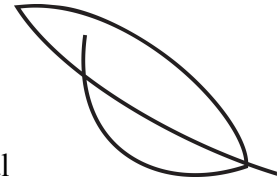
- Such use and/or disclosure is the purpose for which the employee information was collected;
- Such use and/or disclosure is required under or authorized by law;
- It reasonably believes that the use and/or disclosure is necessary to reduce or prevent a serious, immediate threat to health or safety;
- It reasonably suspects that unlawful activity has been, is being or may be engaged in and the use and/or disclosure of employee information is necessary to prevent such unlawful activity;
- The employee has provided written consent for the use and/or disclosure of the nominated information.

#### 5.0 **Security and Storage**

The All Seasons Sanctuary Golf Resort will take all reasonable steps to ensure that employee information is stored securely in an environment that can only be accessed by authorized persons with the knowledge of The All Seasons Sanctuary Golf Resort. The All Seasons Sanctuary Golf Resort will destroy the information if it is no longer needed for the purpose for which it was collected.

#### 6.0 **Access to Personal Information**

This Privacy Policy is available in Human Resources. Upon a written request to the General Manager, The All Seasons Sanctuary Golf Resort will provide an individual with access to or advice on their employee information. If a request for access is denied by The All Seasons Sanctuary Golf Resort then it will provide details of the reasons for denying access to the information.



**7.0 Sensitive Information**

The All Seasons Sanctuary Golf Resort may need to obtain sensitive information in order to comply with its legal and operational requirements. This information will be treated in accordance with the National Privacy Principles.

**8.0 Email and Internet Use**

The All Seasons Sanctuary Golf Resort has an Email and Internet Policy (see Email & Internet Policy 112) which is available in the Human Resources Department.

**9.0 Guidelines for Handling Sensitive Information**

Specific guidelines for employees handling “sensitive information” have been developed and are provided as “Guidelines for Dealing with Employee Information”. Whilst these guidelines mainly relate to Human Resources and Payroll personnel, they apply equally to any employee who has access to information referred to in the guidelines.

**10.0 Complaints**

Any complaints about this Privacy Policy or the collection or use of personal information should be directed in the first instance to the General Manager.

The All Seasons Sanctuary Golf Resort will investigate the complaint and attempt to resolve any breach of the Policy which might have occurred. Complaints will be investigated in accordance with guidelines provided by the Privacy Commissioner.