

1.15 Policy – Privacy

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1. Purpose

The purpose of this document is to provide a framework for the Zoo and Aquarium Association in dealing with privacy considerations. When dealing with personal information we observe our obligations under the Privacy Act 1988 (Cth) and comply with the Australian Privacy Principles, as well as other relevant State legislation. This policy sets out how we will collect, use, store, disclose and de-identify personal information.

2. Scope and exemptions

This Policy applies to all Association operations and activities.

3. Policy Statement

The Zoo and Aquarium Association is committed to protecting the privacy of personal information which the association collects, holds and administers. Personal information is information which directly or indirectly identifies a person.

3.1 General Requirements

The Zoo and Aquarium Association collects and administers a range of personal information for the purposes of running an Association. The Association is committed to protecting the privacy of personal information it collects, holds and administers.

The Zoo and Aquarium Association recognises the essential right of individuals to have their information administered in ways which they would reasonably expect – protected on one hand and made accessible to them on the other.

The Zoo and Aquarium Association is bound by laws which impose specific obligations when it comes to handling information. The organisation has adopted the following principles contained as minimum standards in relation to handling personal information.

The Zoo and Aquarium Association will:

- a) Collect only information which the organisation requires for its primary function;
- b) Ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered;
- c) Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent;
- d) Store personal information securely, protecting it from unauthorised access; and
- e) Provide stakeholders with access to their own information, and the right to seek its correction.

3.2 Collection

The Zoo and Aquarium Association will:

- a) Only collect information that is necessary for the performance and primary function of the Association.
- b) Notify stakeholders about why we collect the information and how it is administered.
- c) Notify stakeholders that this information is accessible to them.
- d) Collect personal information from the person themselves wherever possible.
- e) If collecting personal information from a third party, be able to advise the person whom the information concerns, from whom their personal information has been collected.
- f) Collect Sensitive information only with the person's consent. (Sensitive information includes health information and information about religious beliefs, race, gender and others).
- g) Determine, where unsolicited information is received, whether the personal information could have collected it in the usual way, and then if it could have, it will be treated normally. (If it could not have been, it must be destroyed, and the person whose personal information has been destroyed will be notified about the receipt and destruction of their personal information).

3.3 Use and Disclosure

The Zoo and Aquarium Association will:

- a) Only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose.
- b) For other uses, the Association will obtain consent from the affected person.
- c) In relation to a secondary purpose, use or disclose the personal information only where:
 - a secondary purpose is related to the primary purpose and the individual would reasonably have expected us to use it for purposes; or
 - the person has consented; or
 - certain other legal reasons exist, or disclosure is required to prevent serious and imminent threat to life, health or safety.
- d) In relation to personal information which has been collected from a person, use the personal information for direct marketing, where that person would reasonably expect it to be used for this purpose, and the Association has provided an opt out and the opt out has not been taken up.
- e) In relation to personal information which has been collected other than from the person themselves, only use the personal information for direct marketing if the person whose personal information has been collected has consented (and they have not taken up the opt-out).
- f) State in the Association’s privacy policy whether the information is sent overseas and further will ensure that any overseas providers of services are as compliant with privacy as the Association is required to be.
- g) Where for a legal or other reason we are not required to provide a person with access to the information, consider whether a mutually agreed intermediary would allow sufficient access to meet the needs of both parties.
- h) Make no charge for making a request for personal information, correcting the information or associating a statement regarding accuracy with the personal information.

3.4 Storage

The Zoo and Aquarium Association will:

- a) Implement and maintain steps to ensure that personal information is protected from misuse and loss, unauthorised access, interference, unauthorized modification or disclosure.
- b) Before the Association discloses any personal information to an overseas recipient including a provider of IT services such as servers or cloud services, establish that they are privacy compliant. The Association will have systems which provide sufficient security.
- c) Ensure that the Association’s data is up to date, accurate and complete.

3.5 Destruction and De-Identification

The Zoo and Aquarium Association will:

- a) Destroy personal information once is not required to be kept for the purpose for which it was collected, including from decommissioned laptops and mobile phones.

- b) Change information to a pseudonym or treat it anonymously if required by the person whose information the Association holds and will not use any government related identifiers unless they are reasonably necessary for its functions.

3.6 Data Quality

The Zoo and Aquarium Association will take reasonable steps to ensure the information it collects is accurate, complete, up to date, and relevant to the functions it performs.

3.7 Data Security and Retention

The Zoo and Aquarium Association will:

- a) Permanently de-identify personal information where reasonable and possible; and
- b) Destroy personal information once there is no longer a legal or business need for us to retain it.

3.8 Openness

The Zoo and Aquarium Association will:

- a) Ensure stakeholders are aware of its *Privacy Policy* and its purposes.
- b) Make this information freely available in relevant publications and on the Association's website.

3.9 Access and Correction

The Zoo and Aquarium Association will ensure individuals have a right to seek access to information held about them and to correct it if it is inaccurate, incomplete, misleading or not up to date.

3.10 Making Information Available to Other Organisations

The Zoo and Aquarium Association can release information to third parties where it is requested by the person concerned.

4. Responsibilities

4.1 Compliance

The ZAA Board is responsible for adopting and reviewing this policy.

The Association's Member Support and Operations Manager is responsible for the implementation of this policy, for monitoring changes in Privacy legislation, and for advising on the need to review or revise this policy as and when the need arises.

4.2 Reporting

There are no reporting requirements for this Policy.

5. Related Documents

This policy is to be read in conjunction with the following policies, procedures and guidelines of the Association:

- (a) Constitution
- (b) Code of Conduct
- (c) Member Policy

6. Definitions

In this policy, unless the context requires otherwise:

Board means the board of management of the Association.

Board Member means a member of the Association’s Board.

Code of Conduct means the Association’s Code of Conduct, setting out the standards of ethical and professional practice and conduct for Applicable Persons.

Committee means a committee of the Board established in accordance with clause 33 of the Association’s Constitution.

Constitution means the constitution of the Association, as amended from time to time.

Executive Director means the Executive Director of the Association.

Member means a member of the Association, as defined in the Association’s Membership Policy, and may include an employee, officer or agent of a Member of the Association.

Organisation means an unincorporated entity, or an entity incorporated under Commonwealth, State or Territory legislation.

Subscriber means a subscriber of the Association, as defined by the Association’s Subscribers Policy.

Association means the Zoo and Aquarium Association Inc. (ABN 71 836 556 156).

7. Proviso

The intent of this policy is to provide a framework for the majority of activities undertaken by Association members/subscribers. Any issue/concern which arises that is not covered by this policy, but falls within the purpose of the policy, will be included and addressed by the Association Board, or their delegate, in the best interest of the Association and its membership.

8. Approval and Review Details

Approval History	Details
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This document should be reviewed within five (5) years of the date of approval or last review.

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