

I. KATOOMBA CHRISTIAN CONVENTION – PRIVACY POLICY

Katoomba Christian Convention Ltd ABN 86 000 153 560 (**KCC**) appreciates that privacy is very important. KCC adopted this Privacy Policy as we recognise the right of people to keep their personal information private. As a Small Business under the Privacy Act (annual turnover of \$3 million or less in the previous financial year), KCC is currently exempt from the legislation. However, KCC intends, as far as possible, to comply with the legislation. Accordingly, the Privacy Policy covers KCC's treatment of all private and personal information that we collect or hold.

Privacy Policy Statement

Introduction

Your privacy is important to us. It is KCC's policy to respect the confidentiality of information and the privacy of individuals. The KCC Privacy Policy Statement will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices, and to make sure it remains appropriate to the changing environment. We are committed to being open about how we use personal information. Where our documents ask for personal information, we will endeavour to state the purpose for its use and to whom it may be disclosed.

Purpose of Collecting Information

KCC aims to "run conventions that magnify every Christian's desire to live up to their true calling: holiness". Personal information collected by us is primarily used in the registration process for each convention. We seek to maintain a relationship with delegates over the long term, rather than on a convention by convention basis. As such, personal information about people who are involved with and attend the conventions of KCC is also used to maintain contact with those people in order to minister to them effectively.

What Information is Held?

Because of the nature of the conventions provided, we ask for a range of personal information. The type of information we collect may include (but is not limited to):

- Name;
- Address;
- Contact details; and
- Details of registrations for and attendance of our conventions.

We obtain most of this information directly from our delegates through registration forms and from maintaining records of information provided in the course of ongoing ministry. This information may be collected at our conventions, from responses to our communication to you, or from other public sources. Given that we are dealing with large numbers of delegates and as we need to identify you within our record keeping, we may seek to collect a piece of personal information from you that is in some way unique to yourself. Under the Privacy Principles (as listed in the following attachment) these will not be any Commonwealth Government identifiers (e.g. Medicare number). We may seek to ask you

for only the day and month of your birth. This will help us keep your records unique from other delegates, especially if we have delegates with similar names, and no current address information. If an individual makes a financial payment to KCC then other information such as bank account details and credit card information may need to be collected. At some of our activities we may ask for sensitive information to be collected. For more details, see the section entitled, 'Sensitive information is subject to greater restrictions'.

How do we use this information and whom may we disclose it to?

While we may send you information regarding the activities of KCC from time to time that we think may be useful to you, we are conscious of the need to respect your privacy. We will not disclose information regarding you without your prior consent. The personal information you give to us may be made available to KCC employees, key volunteers and senior leaders at the discretion of the Board and Executive Director. This is in keeping with our stated purpose for the collection of the information:

- The nature of the information being collected;
- The purpose of the collection;
- The nature of the distribution of the list;
- An avenue for people to not have their information listed.

Sensitive information is subject to greater restrictions

Some personal information we hold is 'sensitive'. Sensitive information relates to a person's:

- Racial or ethnic origin;
- Membership of political bodies, religions or trade unions;
- Sexual preferences or activities;
- Criminal record;
- State of health;
- Medical history.

As part of our Privacy Policy we hereby undertake to collect only the following information that is deemed to be 'sensitive information':

- Membership of religions
The form of information collected will be restricted to the denomination, location and name of the church that the individual may attend.
- State of health, medical history
On occasions, we may seek to collect this information, when we consider that the collection is helpful to assist in appropriately managing risk to life and/or health of delegates. For example, when we are dealing with children who for a stated and agreed reason will be absent from their parents and under our care. In such a case, a separate form will be provided for the collection of such information. This form will include (but is not limited to):
 1. The nature of the sensitive information being collected;
 2. The purpose of the collection;
 3. How the information will be stored and used;
 4. How long the information will be stored for;
 5. An avenue for people to not have their information collected – and the consequences of us not being able to collect such information.
- Criminal record and sexual preferences

During the course of collecting and processing information for the Working with Children Check (under the Child Protection Act), it may be made apparent that an individual has a criminal record. This information will only be held according to the guidelines set down in the Child Protection Act. Under circumstances other than the collection of information pertaining to the Child Protection Act, sensitive information regarding criminal records will not be collected.

Management of personal information

KCC seeks to train its employees and volunteers who handle personal information to respect the confidentiality of members' information and the privacy of individuals. KCC regards breaches of your privacy very seriously. We have appointed a Privacy Officer to ensure that the management of your personal information is in accordance with this statement.

Safeguarding the privacy of your information is important to us, whether you interact with us personally, by phone, mail, email, over the internet, or other electronic media. We hold personal information in a combination of secure computer storage facilities and unauthorised access, modification or disclosure. We may need to maintain records for a significant period of time. However, when we consider information is no longer needed, we will remove any details that will identify you or we will securely destroy the records regarding you. KCC endeavours to ensure that the personal information it holds is accurate and up-to-date. We realise that this information changes frequently with changes of address and other personal circumstances. We can update your information over the telephone.

Request/s to view and make amendments

Any individual can at any time view or amend the information that is held on them by KCC. Requests to view or amend personal information can be made by contacting our Privacy Officer:

Privacy Officer
Katoomba Christian Convention
PO Box 156
Burwood NSW 1805

Ph: 1300 737 140

Fax: 1300 737 145

Email: privacy@kcc.org.au

Summary of Privacy Principles

(See www.oaic.gov.au for more information about the Privacy Act)

1. Collection

- 1.1. An organisation should generally collect only the personal information it needs for its legitimate functions and activities. The organisation should collect the information in a fair and lawful way.
- 1.2. Where reasonably practicable and organisation should collect personal information directly from the individual. The organisation should usually take reasonable steps, when collecting information, to ensure that the individual knows why the information is being collected, who the information will be given to and how the information will

be used or disclosed, as well as how to contact the organisation and that the individual may access the information. This is the case whether the organisation collects personal information from the individual or from someone else.

1.3. An organisation should usually ensure it has the consent of the individual to collect sensitive information. Sensitive information is information or an opinion about a person's –

- Religious or philosophical beliefs and affiliations;
- Racial or ethnic origin;
- Political opinions or membership of a political association;
- Membership of professional or trade associations or a trade union;
- Sexual preferences or practices;
- Criminal record; or
- Health.

2. Use and disclosure

An organisation should usually only use or disclose personal information for –

- The primary purpose for which it was collected;
- A related purpose which the individual would reasonable expect; or
- With consent.

3. Data quality

An organisation should take reasonable steps to introduce systems to ensure that personal information it holds is accurate, current and complete.

4. Data security

4.1. An organisation should implement measures to protect personal information from misuse, loss and unauthorised access, changes or disclosure.

4.2. An organisation should usually destroy or permanently de-identify personal information when the organisation no longer needs it.

5. Openness

An organisation should be open about how it manages personal information. If asked, an organisation should provide information about its approach to privacy.

6. Accessing and correcting personal information

6.1. Usually, when asked, an organisation should give an individual access to their personal information unless there is a reason why the organisation cannot do so. An organisation may deny a request for access if it reasonably believes any of the following circumstances apply –

- It would pose a serious and imminent threat to the life or health of any person, or if health information, would pose a serious threat to the life or health of any person;
- The privacy of others would be unreasonably affected;
- The request is frivolous or vexatious;

- The information relates to existing or anticipated legal proceedings with the person who is the subject of the information and would not be accessible in those proceedings;
 - Providing access would prejudice negotiations with the person who is the subject of the information by revealing the organisation's intentions regarding those negotiations;
 - Providing access would be unlawful or denying access is required or authorised by law;
 - Providing access would be likely to prejudice an investigation of possible unlawful activity;
 - Providing access would be likely to prejudice law enforcement, public revenue protection, prevention and remedying of seriously improper conduct of court or tribunal proceedings, either by or on behalf of an enforcement body;
 - An enforcement body performing a lawful security function requests denial of access to protect national security, and where evaluative information generated by the organisation in making a commercially sensitive decision would be revealed by providing access. In this situation, the organisation may provide an explanation for the commercially sensitive decision instead.
- 6.2. The organisation should usually correct personal information if the individual to whom it relates can establish that the information is not accurate, current and complete.
- 6.3. An organisation should not impose an excessive charge for access by an individual to their personal information.

7. Identifiers

An organisation should generally not adopt, use or disclose Commonwealth Government identifiers unless specifically permitted to do so. Identifiers include tax file numbers or social security numbers, but not an ABN.

8. Anonymity

If reasonably possible, an organisation should give others the option of dealing with it anonymously.

9. Transborder data flows

An organisation should generally obtain consent to transfer information overseas unless otherwise permitted to do so.

10. Sensitive information

An organisation should generally obtain consent to collect sensitive information unless otherwise permitted to do so.

Last updated: 11 March 2020

II. THE PLAYTIME GROUP – PRIVACY POLICY

THE PLAYTIME GROUP PTY LTD (“Playtime”) is committed to protecting the privacy of customers’ personal information. We take all reasonable steps to follow practices and procedures that:

- ensure we comply with the Australian Privacy Principles (APPs) and any privacy code applying to us; and
- allow us to deal with enquiries and complaints about our compliance with the APPs and any applicable privacy code.

We may update this Privacy Policy from time to time, so we suggest you check the policy regularly to make sure you have up-to-date information.

If you are under sixteen, you must get permission from your parent or guardian before you:

- complete any forms, questionnaires or surveys for us; or
- accept any special offers or make any purchases from us.

1. WHY WE NEED TO COLLECT PERSONAL INFORMATION

Under the Privacy Act 1988 (Cth), 'personal information' means "information or an opinion about an identified individual, or an individual who is reasonably identifiable". The information/ opinion does not have to be recorded in writing or be true.

We collect personal information from customers so that we can:

- provide you quote on our services

2. HOW WE COLLECT PERSONAL INFORMATION

We collect personal information directly from you when you:

- fill in "talk to us" form

3. THE KINDS OF PERSONAL INFORMATION WE COLLECT

We may collect:

- your name, company name and email address;

4. HOW WE USE YOUR PERSONAL INFORMATION AND WHO WE DISCLOSE IT TO

We use your personal information to:

- provide our services to you
- communicate with you
- offer a quote on our services

MARKETING CONSENT AND OPT OUT

By agreeing to our website terms and conditions you are consenting to us using your personal information for direct marketing and social media marketing. At any time, you can request us to stop sending you marketing communications. Simply email hello@playtimegroup.com.au, telephone 1300 794 770

DISCLOSURE TO THIRD PARTIES

We do not sell or rent our customers' names, addresses, email addresses or other personal information to third parties. We will only disclose your personal information as permitted by the APPs and as described in this Privacy Policy. We may disclose your personal information to:

- (a) a company that is "related" to us under the Corporations Act 2001 (Cth) (but only for one of the purposes listed at the beginning of this section 4);
- (b) third parties we engage to help us provide our products and services, or to improve them (e.g. website designers and technical support providers);
- (c) third parties that provide us with marketing and advertising services (e.g. providers of electronic mail out services);
- (d) selected third parties who have agreed to work with us to make a joint product/ service offering to you, and who are under strict contractual obligations to treat your personal information confidentially); and
- (e) a third party that is taking over the assets or operations of one or both of us.

CONSENT TO DISCLOSURES

By agreeing to our website terms and conditions, you are consenting to us making the disclosures in (a)-(e) above. Without your consent to these disclosures of your personal information, we will unfortunately be unable to provide you with our online services.

DISCLOSURE OUTSIDE AUSTRALIA

We may transfer and store your personal information outside of Australia. We only do so as permit by the APPs and as described in this Privacy Policy. We will take reasonable steps to protect your personal information where overseas disclosure is required.

5. HOW TO ACCESS AND CORRECT PERSONAL INFORMATION

REQUESTS

You can access and correct the personal information we hold about you by contacting us directly and requesting that we give you access and/ or make a correction
email: hello@playtimegroup.com.au, telephone 1300 794 770.

We will respond to requests for access to/ correction of personal information within a reasonable time.

ACCESS

If it's reasonable and practicable to do so, we will give access to the information in the manner you request. However, we may not give you access if we are not obliged to under the APPs. Please note, it's free to make an access request, but we may charge you a fee when you access the information.

CORRECTION

If you request us to correct personal information we hold about you, we will take reasonable steps to make the correction so that, taking into account the purpose for which we hold the personal information, the information is accurate, up-to-date, complete, relevant and not misleading. If:

- we make a correction to personal information about you; and
- before making the correction we had disclosed the information to another entity that is covered by the APPs; and
- you request us to notify the other entity of the correction, we will take reasonable steps to give that notification, unless it is impracticable or unlawful for us to do it.

REFUSALS

If we refuse to:

- allow you access to the personal information we hold about you; or
- give access in the manner you request; or
- correct personal information about you as you request, we will write to you explaining at least:
 - the reasons for our refusal (unless it would be unreasonable for us to give them); and
 - how you can complain about the refusal.

If we refuse to correct personal information as requested by you, you may request us to associate with the information a statement that it is inaccurate, out-of-date, incomplete, irrelevant or misleading. We will then take reasonable steps to associate the statement with the information in a way that makes the statement apparent to users of the information.

6. HOW TO COMPLAIN ABOUT OUR TREATMENT OF YOUR PERSONAL INFORMATION

You can complain about a breach by us of the APPs or a registered privacy code, by hello@playtimegroup.com.au, telephone 1300 794 770

Initially your complaint will be handled by our Customer Service Team, in accordance with established protocols for the particular type of complaint. If no handling protocol exists for your complaint, it will be referred to the relevant general manager for follow-up.

7. SECURITY

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

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

We make every effort to follow industry standard security measures for personal information under our control. All financial information is encrypted during transmission, and we self-certify against industry security standards for payment processing. Only authorised staff and consultants have access (on a restricted basis) to the personal information we collect. We regularly review developments in security and encryption technologies. Unfortunately, no data transmission over the Internet can be guaranteed as totally secure. Accordingly, although we endeavour to protect information you transmit to us, we cannot ensure or warrant the security of that information, and you transmit it at your own risk. You may be able to configure your browser to advise you whether the information you are sending us will

be secure (encrypted) or not secure (unencrypted). Once we receive your transmission, we take reasonable steps to protect the information on our own systems. For more information, you might like to refer to the OAIC Guide to Information Security at, <http://www.oaic.gov.au/privacy/privacy-resources/privacy-guides/guide-to-information-security>

8. WHAT HAPPENS IF YOU DON'T PROVIDE THE PERSONAL INFORMATION WE REQUEST

If you do not provide personal information as requested by us we may not be able to respond to an enquiry or provide some or all of our online services.

9. DESTRUCTION AND DE-IDENTIFICATION OF PERSONAL INFORMATION

We will take reasonable steps to destroy or de-identify personal information if:

- we no longer need to use or disclose the information in any of the ways we are entitled to use or disclose it under the APPs; and
- we are not legally required to keep the information.

10. OTHER MATTERS

UNSOLICITED INFORMATION

If we receive unsolicited personal information about you, which we would not have been entitled to collect under the APPs, we will destroy or de-identify that information if it is lawful and reasonable for us to do so.

ABOUT COOKIES

Web pages on www.playtimegroup.com.au or another of our websites may use 'cookies'. These are small files that are placed on your hard disk for data-collection purposes. Like an IP address, a cookie helps a website remember who you are. Cookies can make your subsequent visits to a website more seamless. You can set your browser to notify you when you receive a cookie, giving you the chance to decide whether or not to accept it. However, by not accepting cookies, some web pages may not display properly or you may not be permitted to access certain information.

GOVERNMENT-RELATED IDENTIFIERS

We will not adopt, use or disclose any identifier that has been issued by a government or government agency in relation to any individual or personal information.

COPIES OF PRIVACY POLICY

If a person or entity requests a copy of this Privacy Policy in a particular form, we will take reasonable steps to comply with that request.

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