

# TiCSA (South Australian Tourism Industry Council) Inc.

## PRIVACY POLICY

This Privacy Policy sets out in accordance with the *Privacy Act 1988* (Cth) the way in which **TiCSA (South Australian Tourism Industry Council) Inc.** and its associated entities (together **TiCSA, we, us, or our**) may collect, store, use, disclose, manage and protect your Personal Information. Our Data Breach Policy forms part of this Privacy Policy and sets out our approach to any data breach.

By:

- (a) applying for membership of TiCSA and buying, using, or otherwise accessing our membership services (**Services**);
- (b) accessing, requesting information on, enquiring about, using, receiving or providing feedback in relation to, TiCSA's operations or services (online, in writing, by telephone or in person); or
- (c) seeking employment with us;
- (d) otherwise providing, or consenting to the collection of, Personal Information by TiCSA, its officers, agents or employees.

If you **do not** agree to us handling your Personal Information in the manner set out in this Policy, we will not be able to provide our Services to you and you should not provide us with any personal information.

### 1. What is Personal Information?

We follow the definition of Personal Information given in the *Privacy Act*:

*Personal Information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:*

- (a) *whether the information or opinion is true or not; and*
- (b) *whether the information or opinion is recorded in a material form or not.*

### 2. What kinds of Personal Information might we collect and hold?

We may collect (and hold) different Personal Information about you depending upon how you interact with us. This information may vary depending on the specific needs of TiCSA, however, it may include your:

- (a) *name, address, email address and telephone number and contact information;*

- (b) *occupation, employment history and educational qualifications;*
- (c) *demographic information such as age or date of birth, location and activities;*
- (d) *image;*
- (e) *business relationship and history with us;*
- (f) *business or associated companies or entities*
- (g) *messages, emails, voicemail and other correspondence and frequency of enquiries;*
- (h) *comments and feedback and responses to surveys;*
- (i) *interaction with websites, including our website*
- (j) *what computer configurations and software you use;*
- (k) *general preferences;*
- (l) *government issued identifiers such as Tax File Numbers, Australian Business Numbers,;*
- (m) *billing and credit card information; and*
- (n) *any additional information relating to you that you provide to us directly.*

If you apply for employment with us your personal information may be disclosed to recruitment agencies for suitability assessment.

### **3. How do we collect Personal Information?**

We collect Personal Information:

- (a) directly from you (when you apply for membership, we contact you, when you contact us, when you use our services, when you engage with us or when we engage with you);
- (b) when conducting our Services;
- (c) when you participate in our marketing activities, such as when you participate in a seminar, when you enter a business card draw; and
- (d) from third parties who you have authorised to provide us with information; and
- (e) from publicly available sources such as the internet and social media.

### **4. How do we hold and secure your Personal Information?**

We store your Personal Information both in hard copy format and digitally, on site. All hard copy material is secured onsite. All digital material is secured using password protected computers. Any digital transfer of Personal Information is secured using [PKCS #1 SHA-256 AES With RSA Encryption]. All confidential documents are securely shredded by a third-party provider after storage is no longer necessary.

TiCSA uses data storage providers located inside Australia [and overseas such as in [country/ies]]. Where appropriate, TiCSA has agreements with its storage providers to keep all Personal Information they store secure, using reasonable and appropriate security methods.

We conduct regular audits of our compliance with this Policy and the Act to ensure that our privacy framework is in line with industry best-practice.

#### **5. Why do we collect, hold, use and disclose Personal Information?**

TiCSA may collect Personal Information for a number of reasons, including:

- (a) providing you or a third party with Services;
- (b) promote your business in and outside Australia
- (c) providing you with information about our Services, events or industry developments;
- (d) sending communications you request or contacting you and responding to your enquiries;
- (e) providing third parties with information about you and your use of our Services;
- (f) ensuring consistency of service across our business and other internal business purposes;
- (g) developing or refining our Services;
- (h) internal business purposes;
- (i) providing you with marketing material;
- (j) contacting you in relation to your membership and our business activities;
- (k) better understanding our members and other stakeholders;
- (l) tailoring our Services;
- (m) publishing testimonials you provide us; and
- (n) corporate governance, auditing and record keeping.

Our use of Personal Information may extend beyond these uses but will be restricted to purposes that we consider to be related to our functions and activities.

#### **6. What do we do with your Personal Information?**

If we collect Personal Information, we may:

- (a) use that information for the purposes stated in this Policy;
- (b) store that information in accordance with this Policy;
- (c) pass that information amongst entities we work with;
- (d) pass that information to third parties who provide products or services to us (including our accountants, auditors, lawyers, IT contractors, and other service providers);

- (e) provide that information to third parties as required or allowed by law.

#### **7. Do you use my information for Direct Marketing?**

We may use your Personal Information to communicate directly with you to promote our Services. We use direct marketing to provide you with information about our Services that we believe you may be interested in. If you receive direct marketing material from us, and do not wish to continue receiving it, please contact us by any of the methods stated in this Policy, asking to be removed from all future direct marketing programs. Once we have received your opt-out request, we will remove you from our direct marketing programs as soon as reasonably practicable.

#### **8. What about Cookies, pixels and analytics?**

When you access our website, we may receive information about you via a 'cookie', a 'pixel' or from analytics software.

These are tools that our web server may direct your traffic to, send to your computer, or embed on a website, when you visit our website. These tools help us to recognise when you re-visit the website, serve you customised content and to optimize your experience. We generally don't collect Personal Information through the use of these tools, though we may be able to access your IP address and information about what your computer technology is when using analytical software.

You may be able to change the settings of your browser so that Cookies are not accepted generally or that you are provided with options to accept or reject them as they are sent to your browser.

#### **9. Do we ever send your information overseas?**

We may upload images and/or footage to our social media accounts from time to time. The social media accounts may be hosted on an overseas server. Where applicable, in the event that your information is sent overseas, we will use our best endeavours to ensure that any overseas supplier will keep all Personal Information secure.

#### **10. Can you access your Personal Information or request it be corrected?**

- (a) You may request access to the Personal Information that we hold about you by contacting us.
- (b) Upon receiving an access request, we may request further details from you to verify your identity. We reserve the right not to provide you with access to Personal Information if we cannot verify your identity to our reasonable satisfaction.
- (c) An administrative fee may be charged to cover our costs in providing you with access to your Personal Information. This fee will be explained to you before it has been incurred.
- (d) We will respond to your access request within a reasonable period of time by:
  - (i) providing you with access to your Personal Information (including in a structured electronic format if you are a resident of the European Union);
  - (ii) rejecting your access request and providing you reasons for this rejection.
- (e) Access requests may be denied where:
  - (i) we believe your request is frivolous or vexatious;
  - (ii) we are entitled to reject a request by law;

- (iii) we are unable to verify your identity; or
  - (iv) you have not paid the administrative fee (if any).
- (f) If you believe that the Personal Information that we hold is inaccurate or otherwise requires correction, you may send us a correction request by contacting us. We will review your Personal Information and respond to the request within a reasonable period of time.

**11. What happens if you want to deal with us anonymously or using a pseudonym?**

When contacting us, you can do so either anonymously or by using a pseudonym. If you do so, we may not be able to provide you with accurate or useful information, and you may not be able to access a full range of our operations and services. Further, we may not be able to investigate incidents or complaints you have made.

**12. Does this policy ever change?**

From time to time we may make changes to this Policy. When we do, we will highlight those changes in yellow highlight for a period of 14 days. Please make sure you review the Privacy Policy each time you visit our website to keep up to date on any changes.

**13. What about the General Data Protection Regulation (GDPR)?**

The GDPR is the European Union (**EU**) data protection law. Australian-based organisations that offer goods or services to persons in the EU or target or monitor the behaviour of persons in the EU may be required to comply with the GDPR regulatory regime.

We are an Australian based organisation providing products and services within Australia. From time to time, we may capture or collect Personal Information that passes through the EU. This might occur, for example, if a person in the EU accesses our website and we collect analytical data about them, if a person in the EU signs up for a newsletter, books services from the EU, or if one of our members gives us information about a person in the EU. If this occurs, we will treat the Personal Information received in accordance with this Policy.

Where data is processed or monitored in the EU, you may have additional rights, such as:

- (a) The right to request that we delete your Personal Information (unless we require that information to comply with a legal obligation, or need it to bring or defend a legal claim); and
- (b) The right to restrict our processing of your Personal Information (where it is inaccurate, would be unlawful to process, or where it has not been deleted due to us needing it to meet a legal obligation).

**14. What happens if you have a question or complaint about how we have handled your Personal Information?**

If you have a question or complaint, you can raise it with us by:

Emailing: [info@ticsa.com.au](mailto:info@ticsa.com.au)

Calling us on (08) 8110 0123; or

Sending a letter to: GPO Box 2071, Adelaide SA 5001

We take all complaints seriously and will respond to you within a reasonable period of time, unless we consider your complaint to be frivolous or vexatious or if we are unable to verify your identity. If you aren't satisfied with the way we have handled your complaint, you can make a complaint to the Office of the Australian Information Commissioner at <http://oaic.gov.au>.

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