

Island Palms Resort Privacy Policy

1. INTRODUCTION

Island Palms Resort respects and upholds your rights to privacy. The *Privacy Act 1988* (Cth) (**Privacy Act**), Australian Privacy Principles and registered privacy codes govern the way in which we must manage your personal information. This policy sets out how we collect, use, disclose and otherwise manage personal information about you.

2. DEFINITIONS

In this policy "Personal Information" and "Sensitive Information" have the same meaning as under the Privacy Act.

3. COLLECTION OF YOUR PERSONAL INFORMATION

We only collect personal information from individuals that is necessary for what we do (such as membership services, membership applications to the club, accommodation services, financial information) and depends on the purpose for which we require the information and may include the following:

- full name, street address, telephone number;
- email address;
- information concerning your payment methods
- proof of identity information and documentation including driver's license information

3.1 Purpose of Collection

Generally, we may collect and use your personal information for one or more of the following:

- Providing services to you
- Processing an application you may have made
- Acting as your agent if you request us to do so
- Undertaking various activities as required by law or legislation
- Facilitating our internal business operations
- Providing you with information about other services that we, our related and other organisations that we have affiliations with offer that you maybe interested in

4. WHAT WE DO WITH YOUR PERSONAL INFORMATION

We use the personal information we hold about you:

- to provide membership services to you;
- to advise you of Club matters that may arise from time to time
- to provide services to you as requested;
- to provide accommodation requests and services to you;
- to supply goods and services to you;

- to communicate with you concerning our activities;
- to respond to feedback from you;
- for our own internal administrative purposes;
- providing promotional offers and special events to you;
- for marketing;
- for planning to improve services we offer to our members and guests.

4.2 We will not disclose your personal information to any person except to our Directors, related entities, contractors, suppliers, distributors and agents used by us in the ordinary course of our business, for example, membership services, mailing services, distribution services, IT services, data analysis, research, advertising or consultancy services. In doing so, we will take all steps as are reasonable to ensure that these parties respect and uphold the provisions of this policy in relation to your personal information.

4.3 By submitting your personal information to us, you expressly consent to us using our personal information to provide you with information about our products, services or events or any other direct marketing activity which we consider may be of interest to you. We may also use your personal information for the purpose of providing you with other information, if it is within your reasonable expectations, that we would send you such information, given the nature of previous communications with you. You may at any time opt out of receiving any communications from us (other than as required for the operation of our business e.g. regarding the payment of membership fees) by using the “unsubscribe” facility included in an email you receive from us or by contacting us using the details set out at the bottom of this document.

5. **WEBSITE USAGE INFORMATION AND COOKIES**

Our website uses small data files called cookies on your computer. One of the primary purposes of a cookie is to save you time. A cookie tells the web server that you have returned to a specific web-page. For example, if you personalise the web-pages on our website or register with us through our website, the cookie helps the website to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When you return to the same web-page, the information you previously provided can be retrieved, so you can easily use the website features that you customised. You have the ability to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser settings to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of our website.

5.1 There is also information about the hardware and software on your computer that is automatically collected by our website. This information can include your IP address, browser type, domain names, browsing preferences, access times and the addresses of referring websites. This information is used by us to maintain the quality of our website and to provide us with information regarding the use of our website. Please keep in mind that if you place personal information on our Facebook page, this information may be collected and used by others.

5.2 We will where possible only collect your personal information directly from you. If we collect your personal information from another person and it is unclear that you have consented to the disclosure of that information to us, we will, whenever reasonably possible, make you aware that we have done this and of the reasons for doing so.

5.3 If you do not provide some or all of the personal information we request, we may be unable to effectively provide our services to you.

6. DATA SECURITY

6.1 We store personal information:

- contained in paper based and other hard copy documents both at our office and at off site secure storage facilities; and
- contained in electronic records, in a controlled and secure environment.

6.2 Those records are only accessible by those persons who require access to the personal information for the purposes of carrying out their work on our behalf.

6.3 We will take all reasonable steps to protect the personal information we hold from misuse and loss and from unauthorised access, modification or disclosure.

6.4 When personal information (such as payment information) is transmitted to other websites, it is protected through the use of Secure Socket Layer (SSL) encryption, the industry standard security measures for transactions made over the Internet.

6.5 We will destroy or de-identify personal information when our legal obligations to retain the information have expired and the information is no longer needed by us.

7. ACCESS TO YOUR PERSONAL INFORMATION

7.1 Except in exceptional cases established by law, you may request access to the personal information we hold about you by writing to our Privacy Officer at the address below. You do not have to provide a reason for requesting access. If we hold personal information you are entitled to access, we will endeavour to provide you with a suitable range of choices as to how you may access that information (e.g. post or collection). Generally, we will make your personal information available to you within 14 days.

7.2 If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, you can ask us to amend it. We will consider your request and:

- if we agree that the information we hold is inaccurate, we will amend it; or
- if we do not agree, then we will add a note to the personal information stating that you disagree with its accuracy.

8. YOUR CONSENT

By using our website, or by accepting the terms of one of our 'terms and conditions' which refer to this policy, you are agreeing to our collection, disclosure, use and storage of your personal information in accordance with this policy. We may revise this policy from time to time within our absolute discretion. This policy replaces our old privacy policy and takes effect immediately. Your continued use of our products, services or website or your continued dealings with us shall be deemed to be your agreement to and acceptance of the terms of this policy.

9. COMPLAINTS

If you do not agree with any part of this policy or if you have any questions about this policy or if you have any complaint regarding the treatment of your privacy by us, please contact our Privacy Officer:

By post: Privacy officer, C/- Island Palms Resort, 13 The Esplanade, Nelly Bay Qld 4819