PRIVACY POLICY

1. POLICY STATEMENT

1.1 Juggle House Experiences collects and stores a range of personal information about individuals, and on occasions their carers and agents for the purpose of:

1.1.1 Organising tours and experiences;

1.1.2 providing assistance to cater for individual needs in accommodation and dining in conjunction with other service providers as part of a tour or experience.

1.2 Juggle House Experiences is committed to protecting the privacy and confidentiality, and dignity, of individuals, and on occasions their carers and agents, and will adopt the:

1.2.1 Objects of the *Privacy Act 1988* and

1.2.2 *Information Privacy Principles.*

1.3 The personal information Juggle House Experiences collects is one of the most valuable elements to being effective in our business. Consistent with the privacy principles of the Office of the Australian Information Commissioner (OAIC), Juggle House Experiences staff will consider the following regarding the collection and retention of personal and sensitive information:

1. Only use the information for the purpose for which it was explicitly collected

2. Collect the minimum amount (rather than collecting anything useful but unnecessary)

3. Store it securely.

2. PERSONAL and SENSITIVE INFORMATION

Personal information is information from which an individual can be identified or whose identity could reasonably be ascertained whether

- the information or opinion is true or not; and
- the information or opinion is recorded in a material form or not.

Sensitive information means information or an opinion about an individuals':

- racial or ethnic origin or
- political opinions or

- membership of a political association or
- religious beliefs or affiliations or
- philosophical beliefs or
- membership of a professional or trade association or
- membership of a trade union or
- sexual orientation or practices or
- criminal record
- health information about an individual
- generic information about an individual
- biometric information that is to be used for the purpose of automated biometric verification or biometric identification or biometric templates.

3. COLLECTION, MANAGEMENT AND STORAGE OF PERSONAL INFORMATION

Juggle House Experiences will:

3.1 only collect information that is required and necessary for the purposes outlined in clause 1.1

3.2 inform individuals, or their parent/guardian/carer, about why the information is being collected and how it is to be administered and protected;

3.3 only use and disclose personal information solely for the main purpose for which it was collected

3.4 obtain consent from the individual, or their parent/guardian/carer, whose personal information is being collected before using or disclosing personal information for any other reason

3.5 only disclose personal information without consent where required by law or for immediate personal safety consistent with the Information Sharing Principles

3.6 every reasonable effort will be made to ensure personal information collected about an individual is accurate, complete and relevant to its purpose

3.7 ensure personal information will be secured against loss and unauthorised access, misuse and alteration

3.8 unless with explicit permission, not provide to other parties so as to receive unwanted direct marketing

3.9 being able to make a complaint if it is considered that their personal and sensitive information has been mishandled

3.10 ensure individuals, or their parent/guardian/carer, whose personal information is being collected is aware of the content and purpose of this Privacy Policy and make this document available:

3.10.1 publicly displayed on Juggle House Experiences' web site

3.10.2 at the commencement of services; and

3.10.3 during the course of services as requested.

4. ACCESS TO PERSONAL INFORMATION

Individuals have the right to access, update and correct their personal information by submitting a written request to the Director of Juggle House Experiences.

4.1 Should an individual be under the age of 18 years, the parent / guardian / carer is responsible for making such a request.

4.2 Should an individual be over the age of 18 years but under a guardianship order, the guardian or nominated representative is responsible for making such a request.

5. LINKS TO LEGISLATION, STANDARDS, GUIDELINES and RESOURCES

Australian Privacy Principles, Office for the Australian Information Commissioner (OAIC)

Children's Protection Act (SA) 1993

Family Law Act 1975

Health Care Act (SA) 2008

Information sharing guidelines for promoting safety and wellbeing (ISG) as set out by the Office of the Ombudsman SA

Intervention Orders (Prevention of Abuse) Act (SA) 2009

Listening and Surveillance Devices Act 1972 (SA)

Mental Health Act (SA) 2009

National Privacy and Confidentiality Standards for Mental Health Services

Privacy Act 1988

South Australian Public Health Act 2011

6. RESPONSIBILITY

The Director of Juggle House Experiences is responsible for this policy and any changes in relevant legislation, as they are identified, and are to be incorporated into reviews of this policy.

Appendix 1 – Updates and Amendments

Date of Operation	Sections Updated or Change	Reasons/Comments
May 2020	New policy developed and approved	Development of policy as part of privacy processes Authorised by Director of Juggle House Experiences