



This Privacy Policy deals with the collection, use, access, and disclosure of personal information gathered by Sanctuary Lakes Resort Services Ltd pursuant to the Privacy Act 1988 (Cth) and the Australian Privacy Principles set out in Schedule 3 of that Act.

Collection

Sanctuary Lakes Resort Services Ltd (SLRS) collects personal information as defined in Section 6 of the Privacy Act 1988, in connection with the owners corporation management of Sanctuary Lakes Resort. Personal information is collected from individuals in the course of Sanctuary Lakes Resort Services Ltd.'s relationship with the 44 owners corporations that make up Sanctuary Lakes. The personal information is collected via the website of Sanctuary Lakes Resort Services Ltd and when individuals submit forms to SLRS.

The type of information that is collected may include your name, address, telephone number, email address, and other like information. Sanctuary Lakes Resort Services Ltd **does not** collect "sensitive information" as defined by the Privacy Act 1988. In the event that any such sensitive information is to be collected then a specific and direct request for consent will be made to the individual. Sensitive information as defined in the Privacy Act includes information relating to a person's racial or ethnic origin, political opinion, membership of a political association, religious beliefs, philosophical beliefs, sexual orientation or practices, criminal record, genetic information, biometric information or other forms of health information.

When you visit our website, we will collect information when:

- registering or subscribing to our services or requesting further services on our website.
- contacting us for any enquiry or query or feedback or comment or lodging a complaint in relation to the activities of the owners corporation.

If you respond voluntarily to any surveys or other interactive communication which we may have with you, we will collect the responses and use the information to improve the quality of our customer service and for the purposes specifically identified in any survey or other interactive communication.

Use and Disclosure

We collect and use your personal information to fulfil the contractual obligations which Sanctuary Lakes Resort Services Ltd has with you and to facilitate the delivery of services to you and the owners corporation. Those services include such services as:

Sanctuary Lakes Resort Services Limited

ABN: 32 092 610 449

Address: 72 Greg Norman Drive, Sanctuary Lakes VIC 3030 Postal: PO Box 7229, Point Cook VIC 3030

Telephone: [\(03\) 9394 9400](tel:(03)93949400) E-mail: ocmanager@sanctuarylakes.com.au Website: www.sanctuarylakesresort.com.au

- maintain owners corporation roll and minute book.
- obtain or update any insurance policies over the property and/or common property managed by the owners corporation.
- maintain a relationship with you.
- comply with legislation and regulatory requirements.
- issue notices.
- distribute minutes of meetings; and
- maintain and replace any damaged property.

The information collected is used to enable Sanctuary Lakes Resort Services Ltd to fulfil its functions and duties pursuant to the Owners Corporation Act 2006 (VIC). In accordance with the Privacy Act and the National Privacy Principle No. 2, Sanctuary Lakes Resort Services Ltd will not use or disclose personal information about you for a purpose other than those identified in this policy except in certain circumstances including:

- Sanctuary Lakes Resort Services Ltd believes that the use or disclosure is necessary to lessen or prevent:
 - a serious and imminent threat to an individual's life, health or safety; or
 - a serious threat to public health or public safety; or
- the use or disclosure is required or authorised by or under law; or
- Sanctuary Lakes Resort Services Ltd reasonably believes that the use or disclosure is reasonably necessary for one or more of the following by or on behalf of an enforcement body:
 - the prevention, detection, investigation, prosecution and punishment of criminal offences, breaches of a law imposing a penalty or sanction or breaches of a prescribed law.
 - the enforcement of laws relating to the confiscation of the proceeds of crime.
 - the protection of the public revenue.
 - the prevention, detection, investigation or remedying of seriously improper conduct or prescribed conduct.
 - the preparation for, or conduct of, proceedings before any Court or Tribunal, or implementation of the orders of a Court or Tribunal.

When Sanctuary Lakes Resort Services Ltd is appointed to provide its services, you will be requested to provide your consent for us to provide marketing material to you. You may stop the delivery or "opt out" of future marketing emails from Sanctuary Lakes Resort Services Ltd or its subsidiaries or associates by following the specific instructions to unsubscribe in any email which you receive.

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Sanctuary Lakes Resort Services Ltd may use your information to provide details of products, services, committee updates, important announcements, news updates, service updates, customer satisfaction surveys or other marketing material. If you wish to unsubscribe to the receipt of this material, then you must do so in the email which you receive.

Disclosure of your information to third parties

Sanctuary Lakes Resort Services Ltd may be required to disclose your personal information to third parties in order to meet its contractual obligations and to fulfil any requests for service. We may also supply your personal information on a confidential basis to external service providers to assist in performing services on our behalf.

Our relationship with such external service providers are governed by the contracts with them and those contracts contain appropriate privacy and confidentiality provisions and Sanctuary Lakes Resort Services Ltd has taken reasonable steps to be satisfied that any third party providers warrant that they will comply with the obligations under the Privacy Act and National Privacy Principles.

Access and correction

Any and all personal information received by Sanctuary Lakes Resort Services Ltd is stored on a secure server. The service provider of the computing facility has warranted via the contracted retainer to:

- comply with all obligations pursuant to the Privacy Act 1988 and the National Privacy Principles; and
- has in place the necessary policies and procedures to comply with the mandatory data reporting scheme established under the Privacy Act 1988.

In relation to the personal information as provided in accordance with the National Privacy Principles:

- you have the right to request access to any information which relates to you; and
- you have the right to request a correction of any information which relates to you which is inaccurate.

Any request for amendment of information received by Sanctuary Lakes Resort Services Ltd must be made in writing and Sanctuary Lakes Resort Services Ltd will comply with the rules and regulations surrounding any correction of data pursuant to National Privacy Principle No.

6. Sanctuary Lakes Resort Services Ltd will not provide access to personal information provided by you in certain circumstances such as:

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- the request for access is frivolous or vexatious.
- the information relates to existing or anticipated legal proceedings between Sanctuary Lakes Resort Services Ltd and the individual, and the information would be accessible by the process of discovery in those proceedings.
- the provision of access would be unlawful.
- the denial of access is required or authorised by or under law.
- provision of access would be likely to prejudice an investigation of possible unlawful activity; and
- the provision of access would be likely to prejudice the prevention, detection, investigation, prosecution or punishment of criminal offences, breaches of a law imposing a penalty or sanction or breaches or prescribed law, or likely to prejudice the protection of the public revenue.

In circumstances where it is lawful and practicable Sanctuary Lakes Resort Services Ltd will permit an individual the option of not identifying themselves when entering into transactions with Sanctuary Lakes Resort Services Ltd in accordance with the provisions of National Privacy Principle No. 8.

Complaints

If a person has any questions in relation to this Privacy Policy or wishes to access or update information or wishes to make a complaint about a breach of this policy to the Office of the Australian Information Commissioner then such complaint should be in writing and addressed to:

The Privacy Officer

Sanctuary Lakes Resort Services Ltd

72 Greg Norman Drive

Point Cook VIC 3030

Email: ocmanager@sanctuarylakes.com.au

Any complaints received in respect to a breach of the Australian Privacy Principle will be reviewed by the privacy officer who will investigate and consider the complaint and provide a written response to the complaint within 30 days of receiving same.

Notification of eligible data breaches

In the event of an unauthorised access to, unauthorised disclosure of, or loss of, personal information held by Sanctuary Lakes Resort Services Ltd, and the access, disclosure or loss is

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likely to result in serious harm to any of the individuals to whom the information relates and Sanctuary Lakes Resort Services Ltd shall pursuant to section 26WH of the Privacy Act:

- carry out a reasonable and expeditious assessment of whether there are reasonable grounds to believe that the relevant circumstances amount to an eligible data breach; and
- take all reasonable steps to ensure that the assessment is completed within 30 days after the entity becomes aware of the eligible data breach and following the assessment Sanctuary Lakes Resort Services Ltd will:
 - notify each individual affected by such eligible data breach; and
 - notify the Office of the Australian Information Commissioner as to the steps taken to notify all relevant persons.

This assessment will be undertaken by the Privacy Officer of Sanctuary Lakes Resort Services Ltd in concert with any such technology consultants as required.

This policy will be reviewed from time to time and amended as necessary to enable Sanctuary Lakes Resort Services Ltd to comply with the Privacy Act 1988, the National Privacy Principles and any other relevant legislative requirements.

SLRS PRIVACY POLICY INTENT

Sanctuary Lakes Resort Services Ltd (SLRS) takes all reasonable steps to ensure that your information is properly protected from unauthorised access or disclosure. Any information collected is stored on our server, which can only be accessed by our staff. We do not use any information collected to send unsolicited advertising material (SPAM) to your computer.

INFORMATION COLLECTED

When you make contact with SLRS we collect the basic details you provide to us including your e-mail address if your enquiry is made via e-mail. When you visit our website at www.sanctuarylakes.com.au our Internet Service Provider makes a record of your visit and logs basic internet address information for statistical purposes.

ACCESS TO INFORMATION COLLECTED

SLRS will not make an attempt to identify users or their browsing activities. However, in the unlikely event of an investigation, a law enforcement agency may exercise its legal authority to inspect our Internet Service Provider's logs.

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USE AND DISCLOSURE OF INFORMATION COLLECTED

We will not disclose information about your individual personal information that you provide such as your name, address, telephone number, e-mail address or credit/debit card details to any outside parties without your consent except when required by law to do so. Your e-mail address will only be used for the purpose for which you have provided it and it will not be added to a mailing list or used or disclosed for any other purpose without your consent unless you specifically request such action. Users are advised that there are inherent risks transmitting information across the Internet that are out of SLRS's control.

LINKS TO OTHER SITES

Our website may offer links to sites that are not operated by SLRS. If you visit one of these linked sites, you should review their privacy and other policies. We are not responsible for the policies and practices of other companies.

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