



PRIVACY POLICY

Contents

1.	PURPOSE	2
2.	APPLICATION.....	2
3.	SCOPE	2
4.	POLICY	2
	4.1 How personal information is collected.....	2
	4.2 How sensitive information is collected	2
	4.3 What information is collected	2
	4.4 Payment Information	4
	4.5 Why personal information is collected.....	4
	4.6 How personal information is collected and stored.....	4
	4.7 Handling of unsolicited personal information	5
	4.8 Ensuring security of personal information	5
	4.9 Accessing personal information held by Paradise Group	6
	4.10 Questions or complaints.....	6
	4.11 Changes to the Privacy Policy.....	7
5.	DEFINITIONS.....	7



1. PURPOSE

The Privacy Policy outlines how Paradise Group ensures compliance with the Australian Privacy Principles as outlined in the *Privacy Act 1988* (Cth).

2. APPLICATION

The Privacy Policy applies in all instances Paradise Group collects personal information.

3. SCOPE

Paradise Group understands that your privacy is important and outlines in this policy how your personal information is managed and protected to ensure your privacy is upheld.

4. POLICY

4.1 How personal information is collected

- a. Paradise Group will not collect personal information unless it is reasonably necessary for, or directly related to, one or more of the functions or activities of the Paradise Group business.
- b. Paradise Group will seek to collect personal information from you directly other than in instances where:
 - i. you have authorised us to collect information from third parties or where it is necessary for us to access information from third parties; or
 - ii. the information can be collected from publicly available resources including websites, public web pages and public databases; or
 - iii. otherwise required or authorised by law.
- c. Where you do not agree to provide Paradise Group with requested personal information it may affect our ability to assist you.

4.2 How sensitive information is collected

Paradise Group may seek to collect sensitive information from you but will only do so where:

- a. you consent to the collection of the information and the information is reasonably necessary for, or directly related to, one or more of the functions or activities of Paradise Group; or
- b. the collection of information is required or authorised by law; or
- c. a permitted health situation exists in relation to the collection of the information; or
- d. there is a permitted general situation.

4.3 What information is collected

- a. Paradise Group collects personal information necessary for providing information about products or services, processing applications for employment, processing orders, processing refunds,



complying with COVID-19 contact tracing requirements and to provide additional services or assistance.

- b. Where you seek to provide information on an anonymous basis or by using a pseudonym, it may not be practicable for Paradise Group to deal with you in all instances.

4.3.1 Applying for roles with Paradise Group

- a. Where you apply for a role with Paradise Group, personal and sensitive information will be collected. This can include but is not limited to:
 - i. name
 - ii. date of birth
 - iii. eligibility to work in Australia
 - iv. home address
 - v. phone number
 - vi. email address
 - vii. references
 - viii. qualifications
 - ix. licences
 - x. sensitive information regarding any pre-existing injuries or medical conditions which may affect your ability to perform the role you have applied for with Paradise Group.

4.3.2 Customers of Paradise Group

- a. Where you are a customer of Paradise Group whether online or in store, personal information will be collected including:
 - i. name
 - ii. email address
 - iii. phone number
 - iv. bank or credit card details
 - v. any other information you include in the details of an order or enquiry
 - vi. feedback received from you whether by phone, email or in writing

4.3.3 Website Users

- a. Paradise Group collects and uses the following information accumulated from all website visitors to analyse how our website is interacted with so that we can improve our website services:
 - i. IP address
 - ii. browser type
 - iii. operating system used
 - iv. internet connection
 - v. website visited prior to our website
 - vi. name, email address and other details provided by you where you interact with relevant sections of our website and provide that information
- b. Paradise Group may use cookies on our website to analyse how our website is being used by visitors and to help us provide a better website visitor experience.



- c. As you navigate through our Website, we may use automatic data collection technologies including Google Analytics™ and Facebook™ retargeting pixel to collect certain information about your equipment, browsing actions, and patterns. This will generally include information about your location, your traffic pattern through our website, and any communications between your computer and our Website.
- d. Paradise Group website may have links to other websites not owned or controlled by Paradise Group including social media sites.
- e. The information we collect automatically is used for statistical data and will not include personal information. We use this data to improve our Website and our service offerings and ad targeting. To the extent that you voluntarily provide personal information to us, our systems will associate the automatically collected information with your personal information.
- f. Paradise Group is not responsible for the privacy practices of third party websites and persons accessing third party websites from the Paradise Group website should read the privacy policies of those third parties.

4.4 Payment Information

- a. We may collect your credit card details to process orders.
- b. We do not store credit card details.

4.5 Why personal information is collected

- a. The purpose for which personal information is collected by Paradise Group is typically to conduct our business, manage our contractual relationships, manage safety and security risks, monitor our website and other applications and to comply with our legal obligations.
- b. Paradise Group may use personal information collected from you to provide you with information and updates on our services including new products, services and opportunities available to you.
- c. Paradise Group may contact you using the contact details in the personal information you provide.

4.6 How personal information is collected and stored

- a. Paradise Group will not seek to disclose information collected for a secondary purpose unless you have consented to the disclosure or where permitted to make the disclosure under the *Privacy Act*. This includes where:
 - i. we disclose your personal information to any of our employees, insurers, professional advisers, agents, suppliers or subcontractors as would reasonably be expected; or
 - ii. we seek to meet a legal requirement, such as a law, regulation, court order, subpoena, warrant, in the course of a legal proceeding or in response to a law enforcement agency request; or



- iii. we seek to protect the copyright, trademarks, legal rights, property or safety of Paradise Group, its customers or third parties; or
 - iv. a permitted health situation exists.
- b. Paradise Group do not currently provide personal information to entities outside of Australia and do not store, process or back-up personal information on computer servers or networks which are located overseas or in cloud-based applications. In the event your personal information is provided to overseas entities, we will take reasonable and necessary steps to notify you.
 - c. If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law our user databases, together with any personal information and non-personal information contained in those databases. This information may be
 - d. disclosed to a potential purchaser under an agreement to maintain confidentiality. We would seek to only disclose information in good faith and where required by any of the above circumstances.
 - e. By providing us with personal information, you consent to the terms of this Privacy Policy and the types of disclosure covered.
 - f. Where we disclose your personal information to third parties, we will request that the third party follow this Policy regarding handling your personal information to the highest extent possible.

4.7 Handling of unsolicited personal information

Where Paradise Group receive personal information and they did not solicit the personal information, they will destroy or de-identify information if it is lawful and reasonable to do so as soon as practicable unless they determine they could have collected the information in accordance with the outlined collection methods in this policy.

4.8 Ensuring security of personal information

- a. Paradise Group will take all reasonable steps to ensure your information is protected from:
 - i. Misuse, interference and loss; and
 - ii. From unauthorised access, modification or disclosure.
- b. Paradise Group protects your information by using encrypted software and restricting access to files containing personal information to authorised personnel outlined below:
 - i. Human Resources
 - ii. Payroll
 - iii. Managing Director
- c. Authorised personnel will only access your personal information for a permitted purpose or as required by law.
- d. Paradise Group will only keep personal information for as long as necessary for the relevant purpose of the information or as otherwise required by law.



- e. When no longer required to hold information about you, Paradise Group will take reasonable steps to de-identify or destroy the information.

4.9 Accessing personal information held by Paradise Group

- a. You may request details of personal information Paradise Group holds about you in accordance with the *Privacy Act 1988* (Cth).
- b. Paradise Group may refuse requests to access personal information where:
 - i. the request is frivolous or vexatious
 - ii. access would be unlawful
 - iii. providing access would pose a serious threat to the life, health or safety of a person
 - iv. the request relates to existing or anticipated legal proceedings and is not available by the process of discovery
 - v. denial of access is authorised or required by law
 - vi. any other reason outlined in the *Privacy Act*
- c. An administrative fee will not be charged where a request is made for personal information.
- d. If you would like a copy of the information, which we hold about you or you seek to correct personal we hold on you that you consider is inaccurate, out of date, incomplete, irrelevant or misleading, please email us at ohs@paradisegroupnt.com.au

4.10 Questions or complaints

- a. If you seek to make a complaint about the way in which your information has been handled including a breach of this privacy policy or the Australian Privacy Principles under the *Privacy Act 1988* (Cth), you can lodge a formal complaint in writing using the contact details outlined.
 - Email: ohs@paradisegroupnt.com.au
 - Post:

PO Box 41697

Casuarina NT 0811
- b. Paradise Group will review your complaint to determine if any immediate action can be taken to resolve your complaint.
- c. If Paradise Group consider your complaint requires further investigation, we will respond to you in writing to advise of this. We may also request further information about your complaint including the outcome you are seeking.
- d. Paradise Group will endeavour to investigate and respond to your complaint within thirty (30) business days. Where this is not possible we will advise you in writing.
- e. Where you are not satisfied with our response to your complaint, you may refer your complaint to:



Office of the Australian Information Commissioner (OAIC)

- Phone: 1300 363 992
- Writing : use the Contact Us form on the OAIC website www.oaic.gov.au

4.11 Changes to the Privacy Policy

- a. Please be aware that Paradise Group may change this Privacy Policy in the future and may modify this policy at any time, at our discretion.
- b. This policy may be amended where new laws, technology, changes to operations and practices or changes in the business environment occur.
- c. You will always be able to view a copy of our current privacy policy on our website.

5. DEFINITIONS

Australian Privacy Principles means the *Australian Privacy Principles* as set out in Schedule 1 of the *Privacy Act 1988* (Cth).

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

Privacy Act means the *Privacy Act 1988* (Cth).

Sensitive information means:

- (a) information or an opinion about an individual's:
 - i. racial or ethnic origin; or
 - ii. political opinions; or
 - iii. membership of a political association; or
 - iv. religious beliefs or affiliations; or
 - v. philosophical beliefs;
 - vi. membership of a professional or trade association; or
 - vii. membership of a trade union; or
 - viii. sexual orientation or practices; or
 - ix. criminal record;

that is personal information; or

(b) health information about an individual; or

(c) genetic information about an individual that is not otherwise health information; or

(d) biometric information that is to be used for the purpose of automated biometric verification or biometric identification;



Or

(e) biometric templates.

6. VERSION CONTROL

Document Name	Created	Version	Reviewed	Reviewer
Privacy Policy	1 November 2021	V2	5 November 2021	Chamber of Commerce NT
Document uncontrolled if printed				