



centennial  
park

## Privacy Policy

**Approved: 15 May 2026**

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<b>Reviewed by:</b>	CEO
<b>Approved by:</b>	CEO
<b>Approved Date:</b>	15 May 2026
<b>Signature</b>	
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<b>Legislation:</b>	Privacy Act 1988 (Cth) Freedom of Information Act 1991 (Cth)
<b>Related Documents:</b>	

## 1. Introduction

The purpose of this Privacy Policy (**the Policy**) is, in the absence of any legal obligation to do so, to record and state the position of the Centennial Park Cemetery Authority (**Centennial Park**) in relation to the types of personal information Centennial Park collects and holds and how Centennial Park uses, stores, secures, discloses and disposes of personal information.

We recognise the sensitive nature of the information that we handle and are committed to treating all personal information with dignity, care and respect.

## 2. Scope

This Policy applies to all persons who may have previously provided or who do in the future provide, personal information to Centennial Park, or for whom Centennial Park may hold personal information. The Policy does not apply to information or records that are publicly available.

By providing personal information to us, an individual agrees to Centennial Park collecting, holding, using, storing, securing, disclosing and disposing of their personal information in accordance with this Policy.

## 3. Legislative Framework

- 3.1 Centennial Park is not, as a matter of law, bound by the *Privacy Act 1988* (Cth) (**Privacy Act**). However, in collecting, holding, using, storing, securing, disclosing and disposing of personal information, Centennial Park acknowledges that the Australian Privacy Principles (**APPs**) set an appropriate standard for privacy protection of personal information.
- 3.2 Centennial Park recognises and acknowledges that there will be occasions when other legislative requirements may require personal information to be included in public documents or otherwise disclosed. For example, *Freedom of Information Act 1991* (Cth).

## 4. Types of Personal Information Collected and Held

- 4.1 Personal information will be collected only where it is reasonably necessary for Centennial Park to carry out its business. The type of personal information that is collected may include, but is not limited to:
  - 4.1.1 names, residential addresses, email addresses and phone numbers;
  - 4.1.2 date of birth, gender and other identification details;
  - 4.1.3 citizenship, residency and visa status;
  - 4.1.4 identity documents, including driver's licence and passport details;
  - 4.1.5 details of next of kin, family members and authorised representative;
  - 4.1.6 details of interment right holders and licence holders;
  - 4.1.7 credit card or bank account details;
  - 4.1.8 tax file numbers or superannuation details;
  - 4.1.9 education, qualification, employment and referee details;
  - 4.1.10 photographic image(s), video(s), including CCTV footage and/or recording(s) of voices;

- 4.1.11 burial or cremation details including plot or memorial location and religious or cultural preferences;
  - 4.1.12 account and authentication information such as usernames, passwords, multi-factor authentication credentials, device identifier login history and security verification information; and
  - 4.1.13 other personal information notified or requested at the time of collection or as permitted or required by law.
- 4.2 Centennial Park may also collect sensitive information about its clients and/or a deceased individual for whom it provides a service, where it has express consent or where authorised by law. This may include, where appropriate and reasonably necessary, sensitive information in relation to, without limitation:
- 4.2.1 religious beliefs or affiliations;
  - 4.2.2 racial or ethnic origin;
  - 4.2.3 sexual orientation;
  - 4.2.4 health related information required for lawful interment processes;
  - 4.2.5 membership of a body or group; and/or
  - 4.2.6 other sensitive information notified or requested at the time of collection or as otherwise permitted or required by law.
- 4.3 Centennial Park records information relating to deceased persons, including names, dates of birth and death, interment details and location information as required by law.

## 5. Collection of Personal Information

- 5.1 Centennial Park will usually collect personal information directly from individuals, which may occur when individuals:
- 5.1.1 speak with an employee, representative or agent of Centennial Park in person or by telephone;
  - 5.1.2 send an email or a message through publicly accessible pages on our website;
  - 5.1.3 send hard copy documents to Centennial Park; and/or
  - 5.1.4 interact with Centennial Park or its representatives or agents online, for example, through Centennial Park’s website, website cookies, member login portals, the online memorial search portal, social media, or online store.
- 5.2 Centennial Park will also collect personal information from individuals through video or CCTV surveillance.
- 5.3 Individuals have the right to refuse to provide personal information. However, in doing so, this may result in Centennial Park being unable to provide services, communicate with individuals or respond to an individual’s queries, or it may limit the type or nature of the services able to be provided.
- 5.4 Personal information may also be collected from third parties, such as family members, funeral homes, hospitals or nursing homes, or when undertaking reference or qualification checks, where it is unreasonable or impracticable to collect personal information directly from an individual.
- 5.5 Centennial Park’s website may contain links to other sites that are controlled by third parties. Individuals should consult the privacy policies for those other sites. Centennial Park does not accept responsibility for any collection or use of personal information by websites other than Centennial Park’s own website.

## 6. Storage and Security of Personal Information

- 6.1 Centennial Park takes reasonable steps, including administrative, technical and physical measures, to protect the personal information it holds, in both physical and/or electronic form, from loss, interference, unauthorised access, use, modification or disclosure, or other misuse, including:
- 6.1.1 Centennial Park stores personal information in computer systems and databases operated either by Centennial Park or its external service providers. Personal information may also be stored in secured physical form by Centennial Park or its external service providers;
  - 6.1.2 Centennial Park has in place computer software and hardware, including electronic protection and security measures, to protect and secure the personal information that it holds;
  - 6.1.3 Centennial Park has in place documented data management procedures in relation to the collection, physical security and storage of hard copy and electronic records;
  - 6.1.4 if a client provides credit card information online, the information is securely encrypted and Centennial Park follows all PCI-DSS requirements and implements additional protective measures where possible;
  - 6.1.5 CCTV footage is accessed only by authorised personnel and is retained for a limited period unless required for investigation or legal purposes.
- 6.2 In the event of a data breach, Centennial Park will take relevant steps in accordance with applicable legal obligations.
- 6.3 All Centennial Park staff, employees, directors, volunteers and contractors are required to report any suspected data breach to the Privacy Officer as soon as possible and to comply with all reasonable directions of Centennial Park.
- 6.4 When personal information is no longer needed for the purpose for which it was collected or for any secondary purpose as referred to in this Policy and is not otherwise required to be retained by law, Centennial Park will take reasonable steps to destroy or de-identify that personal information.

## 7. Purpose of Collection, Use and Disclosure of Personal Information

- 7.1 Centennial Park collects, holds, uses, stores, secures and discloses personal information for the primary purpose for which it was collected. Centennial Park may collect, use and disclose personal information for the following non-exhaustive reasons:
- 7.1.1 providing clients and their families with services, including burial, crematorium, funeral and memorial services;
  - 7.1.2 communicating with clients and their families;
  - 7.1.3 contacting individuals to respond to queries;
  - 7.1.4 identifying clients and verifying the identity of individuals;
  - 7.1.5 to enable secure access to systems, detect fraudulent or unauthorised activity and protect our services and users;
  - 7.1.6 meeting obligations under the *Freedom of Information Act 1991* (Cth), or other State and Commonwealth legislation or to assist government and law enforcement agencies or regulators;
  - 7.1.7 recruitment and screening of employees or candidates;

- 7.1.8 providing services to employees, including, for example, human resources and payroll services;
  - 7.1.9 managing burial, cremation and memorial services including public burial registers and statutory records which may include burial or location details of the deceased;
  - 7.1.10 other internal business processes, functions and activities;
  - 7.1.11 protecting or defending the rights or property of Centennial Park or protecting the personal safety of users of services or the public, including CCTV records for the purpose of safety, security and vandalism prevention;
  - 7.1.12 preventing or investigating any possible wrongdoing in connection with services;
  - 7.1.13 identifying and telling individuals about services that may be of interest to them; and
  - 7.1.14 other purposes notified at the time of collection.
- 7.2 Centennial Park may also use or disclose personal information for another purpose than the primary purpose for which it was collected, where:
- 7.2.1 an individual consents to the use or disclosure of their personal information for another purpose;
  - 7.2.2 an individual would reasonably expect Centennial Park to use or disclose the information for a related purpose (or, if the information is sensitive information, for a directly related purpose);
  - 7.2.3 Centennial Park is required to comply with a legal obligation, such as a subpoena, or otherwise as required or authorised by law; or
  - 7.2.4 where Centennial Park reasonably believes that the use or disclosure is reasonably necessary for enforcement related activities by or on behalf of an enforcement body.
- 7.3 Centennial Park may disclose personal information to our employees, contractors and related entities, third party providers including funeral directors, IT, professional advisors including legal and accounting and auditing services as well as regulators and law enforcement agencies where required or authorised by law.
- 7.4 Centennial Park may combine personal information held about an individual with other information that it holds about that individual.
- 7.5 Centennial Park does not sell personal information to third parties.
- 7.6 Personal information may be disclosed, transferred and/or stored by Centennial Park overseas, including in storage or cloud facilities provided by third parties. The countries in which these overseas recipients may be located may vary from time to time and are likely to include, at least, Ireland. When disclosing personal information to overseas recipients, Centennial Park takes all steps that are reasonable in the circumstances to ensure that the personal information is treated in accordance with APPs.
- 7.7 Web traffic information is disclosed to Google Analytics when you visit Centennial Park's website. Google stores information across multiple countries.
- 7.8 When you communicate with Centennial Park through a social network service, the social network provider and its partners, who may be located overseas, may collect and hold your personal information.

## 8. Direct Marketing

- 8.1 Centennial Park may, on occasion and where reasonable and appropriate, use personal information in providing direct marketing information to individuals.
- 8.2 Direct marketing may occur via email, social media, SMS or telephone.
- 8.3 Where direct marketing is transmitted electronically or by telephone, Centennial Park will always comply with any applicable laws including the *Spam Act 2003 (Cth)*, *Spam Regulations 2021 (Cth)* and the *Do Not Call Register Act 2006 (Cth)*.
- 8.4 Direct marketing will ordinarily be directed to:
  - 8.4.1 Interment Right Holders and Authorised Persons; and
  - 8.4.2 subscribers to the e-newsletter *Parklife* or social media platforms.
- 8.5 Individuals may withdraw their consent to receive marketing information at any time. An option to unsubscribe will be contained in every marketing communication that Centennial Park sends. Alternatively, consent may be withdrawn at any time by writing to [marketing@centpark.org.au](mailto:marketing@centpark.org.au).

## 9. Artificial Intelligence and Automated Decisions

- 9.1 Centennial Park may use artificial intelligence such as automated systems or technologies, where they provide efficiencies and/or other advantages to the business. Where Centennial Park decides to use artificial intelligence products, it will comply with applicable laws and regulations.
- 9.2 Centennial Park does not currently use personal information about any individual in any solely or partially automated processes involving decisions which would significantly affect the rights and interests of any individual.

## 10. Service Providers

- 10.1 Centennial Park may employ third party companies or individuals to facilitate or provide services on its behalf. These third parties have access to personal information solely for the purpose of performing these tasks on behalf of Centennial Park. Those third parties will be advised of this Policy and their obligations to comply with it, meaning that they too are, equally, obliged to not disclose or use personal information for any other purpose.

## 11. Accessing and Correcting Personal Information

- 11.1 Centennial Park will take reasonable steps to ensure that all personal or sensitive information collected, used and disclosed is accurate, up-to-date and complete.
- 11.2 Individuals may request access to, or seek a correction of, their personal or sensitive information held by Centennial Park. Any such request must be made in writing using the contact details set out below.
- 11.3 Whilst access will ordinarily be facilitated for an individual to their personal information, there may be exceptions to providing access. Exceptions include where:
  - 11.3.1 providing access would have an unreasonable impact on the privacy of other/another individual(s);
  - 11.3.2 providing access may pose a serious threat to life, health or safety of any individual or to public health or safety;
  - 11.3.3 the request for access is frivolous or vexatious;

- 11.3.4 providing access would reveal evaluated information generated in connection with a commercially sensitive decision-making process;
  - 11.3.5 the personal information relates to existing or anticipated legal proceedings between Centennial Park and the individual and would not be accessible by the process of discovery in those proceedings;
  - 11.3.6 providing access would be likely to prejudice negotiations with the individual, enforcement related activities, or actions in relation to suspected unlawful activity or serious misconduct relating to Centennial Park;
  - 11.3.7 access would be unlawful; or
  - 11.3.8 as otherwise required, authorised or permitted by law.
- 11.4 Centennial Park may require proof of identification before providing an individual with, or correcting, requested personal information.
- 11.5 Centennial Park will take reasonable steps to correct personal information to ensure that it is accurate, up-to-date, relevant and not misleading, where requested by the individual. Centennial Park will also do so where it is otherwise satisfied, having regard to a purpose for which the personal information is held, that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading.
- 11.6 Centennial Park reserves the right to charge a reasonable fee for providing access to personal information but will not charge people for making an application for access to correct personal information. A response will be provided within a reasonable period after a request is made.
- 11.7 If a request for access or correction is denied, Centennial Park will, within a reasonable timeframe, provide reasons in writing as to why the request was refused and mechanisms available to complain about the refusal.

## 12. Questions or Complaints

- 12.1 If you have any questions or complaints regarding this Policy, or if you believe there has been a breach of this Policy, please contact Centennial Park’s Privacy Officer. Centennial Park will investigate complaints and respond within a reasonable time.

PRIVACY OFFICER	
By Email	By Mail
privacy@centpark.org.au	Privacy Enquiries Centennial Park Cemetery Authority 760 Goodwood Road, PASADENA SA 5042

## 13. Roles and Responsibilities

- 13.1 Managers and Supervisors are responsible for complying with this Policy and supporting its successful implementation within their department/section/area and ensuring employees in their department are aware of, and observe, Centennial Park’s expectations of employee conduct.
- 13.2 Team members are responsible for familiarising themselves and complying with this Policy and ensuring they access current versions of this Policy from the intranet when referencing content and taking responsibility for managing/destroying any uncontrolled hard copies of this Policy.

## 14. Deviation or Changes to this Policy

14.1 Deviations from this Policy must be authorised by the CEO of Centennial Park, and any such deviation recorded and reported to the Centennial Park Board.

14.2 This Policy will be reviewed periodically and may be amended at any time.

## 15. Definitions

<b>Information &amp; Records</b>	Information in electronic or hard copy form, including images and databases.
<b>PCI-DSS</b>	Payment Card Industry Data Security Standard is a set of security standards that outline requirements for the secure management of credit card data.
<b>Personal Information</b>	<p>Information or an opinion about an identified individual, or an individual who is reasonably identifiable:</p> <p>(a) whether the information or opinion is true or not; and</p> <p>(b) whether the information or opinion is recorded in a material form or not, or as otherwise defined in the <i>Privacy Act</i>.</p> <p>Personal information does not include information that is:</p> <ul style="list-style-type: none"> <li>• available in publicly available publications;</li> <li>• material kept in public records and archives such as the Commonwealth or State archives; or</li> <li>• anything kept in a library, art gallery or museum for the purpose of reference, study or exhibition.</li> </ul>
<b>Sensitive Information</b>	<p>(a) Information or an opinion about an individual's:</p> <ul style="list-style-type: none"> <li>• racial or ethnic origin;</li> <li>• political opinions;</li> <li>• membership of a political association;</li> <li>• religious beliefs or affiliations;</li> <li>• philosophical beliefs;</li> <li>• membership of a professional or trade association;</li> <li>• membership of a trade union;</li> <li>• sexual orientation or practices; or</li> <li>• criminal record;</li> </ul> <p>that is also personal information;</p> <p>(b) health information about an individual;</p> <p>(c) genetic information about an individual that is not otherwise health information;</p> <p>(d) biometric information that is to be used for the purposes of automated biometric verification or biometric identification; or</p> <p>(e) biometric templates;</p> <p>or as otherwise defined in the <i>Privacy Act</i>.</p>