



This **Privacy Policy** has been published to provide a clear and concise outline of how and when personal information is collected, disclosed, used, stored and otherwise handled by First Light Widowed Association Inc. ("First Light"). The Policy relates to personal information collected by any means and by any technology.

First Light treats the handling of your personal information very seriously. To that end, First Light has systems and procedures in place to protect your privacy in relation to the handling of your personal information.

First Light abides by the Australian Privacy Principles, which provide a scheme in relation to the collection, disclosure, use and storage of personal information. First Light's objective is to handle information responsibly and provide you with some control over the way information about you is handled.

1. Collection of Personal Information

Personal information is information from which an individual's identity may be ascertained. The nature of personal information collected by First Light generally comprises an individual's name and contact details (including address, phone, e-mail and date of birth). If possible and reasonably practical you will have the option of not identifying yourself or using a pseudonym in providing such information. However, if you do not identify yourself, First Light may not be able to give you the information and services you would otherwise receive. Such personal information is collected for the purposes of arranging, conducting and promoting First Light's business activities.

First Light does not collect personal information unless it is reasonably necessary for First Light to perform one or more of its functions and business activities. On occasion, some of this personal information may be sensitive and First Light will only collect it with your consent or when required to by law.

First Light will destroy personal information when it is no longer required for such functions and business activities.

First Light will generally collect personal information from you directly. For example, First Light may collect personal information via telephone, email or letter, or when you attend a function or event, interact with our online communities or enter an agreement.

2. Use & Disclosure of Personal Information

Personal information provided to First Light may be shared with related companies within First Light, where it will be kept strictly confidential and will only be disclosed on a need to know basis.

First Light will use and disclose your personal information for the purpose for which the personal information was initially collected.

First Light may also use that personal information for a purpose related to the initial purpose of collection if that other purpose would be within your reasonable expectations. Related purposes might include internal auditing and administration, adding your name to a contact list, guest list or invitation list or helping us to identify production and broadcast business activities or investment opportunities which may be of benefit or interest to you.

First Light will not use or disclose your personal information for any other purposes without first obtaining your express or implied consent. First Light may however be required to disclose your personal information without your consent if the disclosure is:

- required or authorised by law;
- required in order to investigate an unlawful activity;
- required by an enforcement body for investigative activities; or
- necessary to prevent a serious and imminent threat to a person's life, health or safety, or to public health or safety.

Generally, First Light will retain your personal information within Australia and not use or disclose it overseas. However, on some occasions the information may need to be transferred overseas in order to perform one of First Light's functions or activities. In these circumstances, First Light will either obtain your express or implied consent or will take such steps as a reasonable to ensure that your personal information will receive protection similar to that which it would have if the information were in Australia.

Like most business organisations, First Light relies on third party suppliers who are contracted to conduct specialised activities such as insurance broking, supply of equipment, business services, security services and travel and hospitality services. While personal information may be provided to these suppliers in order to enable them to perform the agreed tasks, First Light will make every effort to ensure that the supplier handles the personal information in accordance with the Australian Privacy Principles and confidentiality principles. First Light will require all such suppliers to provide privacy undertakings and where necessary enter confidentiality agreements.

First Light may also need to provide your personal information to third parties where:

- First Light are (in limited circumstances) allowed or required to by law or where they have a public duty to do so. For example, a Court, a regulator (such as the Australian Securities and Investments Commission (**ASIC**) or the Australian Tax Office (**ATO**)) or the police can compel the disclosure of personal information; or
- You have expressly consented to your personal information being supplied to others. Usually such consent will be required in writing however in special circumstances You may be able to provide consent verbally; or
- It can be reasonably inferred from the circumstance that you consent to your personal information being disclosed. For example your consent will be implied for First Light to use and disclose your information to inform you of products and services that First Light believes may interest you. However your implied consent may be withdrawn at any time.

We may sometimes have to transfer your personal information overseas, including but not limited to recipients located in the United States of America or the United Kingdom. We will only do so in accordance with the Australia Privacy Principles and Australian privacy law in general.

3. Direct marketing

From time to time First Light may use your personal information to identify business activities or opportunities which may be of interest to you.

If you do not wish to receive direct marketing information, please let First Light know. First Light will take immediate steps

to ensure that you do not receive any direct marketing information in future.

4. Personal Information Quality

First Light's objective is to ensure that all personal information collected by us is accurate, complete and up-to-date. To assist First Light in achieving its objective, please contact us if any of your details change. Further, if you believe that the information First Light holds is not accurate, complete or up-to-date, please contact us in order to have the information corrected.

5. Personal Information Security

First Light is committed to keeping your personal information secure, and we will take all reasonable precautions to protect your personal information from unauthorised access, loss, misuse or alteration.

Your personal information may be stored in hard copy documents, or electronically on First Light's software or systems.

First Light maintains up-to-date techniques and processes which meet current industry standards to protect your personal information both through physical security over its paper and electronic data stores, such as locks and security systems, and computer and network security systems with firewalls, encryption technology and passwords to control and restrict access to authorise staff for approved purposes.

Where information is particularly sensitive, the information is overwritten and then manually deleted.

6. Access to Personal Information

You may request access to the personal information First Light holds about you.

The procedure for gaining access is as follows:

- All requests for access to your personal information must be made in writing and addressed to the Secretary.
- You must provide as much detail as possible regarding the business entity, department or person to whom you believe your personal information has been provided, and when. This will allow First Light to process your request faster.
- First Light will acknowledge your request within 14 days, and access will usually be granted within 30 days or otherwise within a reasonable period after the request is made. First Light will inform you if this timeframe is not achievable.
- You will be asked to verify your identity.
- A fee may apply to such access in the event that a request for access is onerous or time consuming. Such a fee will cover staff costs involved in locating and collating information, and reproduction costs.
- Depending on the circumstances, First Light will make all reasonable attempts to give access to the information in the manner you requested. If the manner requested is not reasonable and/or practicable you may be forwarded the information by another means reasonable in the circumstances, for example by mail or email, or you may be required to personally inspect your records at the appropriate place.
- You will be given the opportunity to correct any personal information which is no longer accurate.

In some circumstances, First Light may not be in a position to provide access. Such circumstances include where:

- access would create a serious threat to safety;
- providing access will have an unreasonable impact upon the privacy of other individuals;
- denying access is required or authorised by law;

- the request is frivolous or vexatious;
- legal proceedings are underway or otherwise anticipated;
- negotiations may be prejudiced by such access; or
- access would reveal a commercially sensitive decision making process.

If First Light denies access to your personal information, it will provide you with reasons in writing.

7. Changes To This Policy

First Light may change this Policy from time to time for any reason and will update the Policy accordingly.

8. Complaints

If you believe that your privacy has been infringed you are entitled to complain. All complaints should initially be in writing and directed to the Secretary on:

Mail: PO BOX 3259, Newmarket QLD 4051

First Light will respond to your complaint as soon as possible, within 14 working days, to let you know who is responsible for managing your query. First Light will try to resolve the complaint within 30 working days. When this is not possible First Light will contact you to provide an estimate of how long it will take to handle the complaint.

While First Light aims to resolve your complaints at your first point of contact if you are still unhappy the Office of the Australian Information Commissioner can be contacted through the privacy hotline on 1300 363 992.