

Privacy Policy

ARV Corporate Policy

1. Statement

Alpine Resorts Victoria (ARV) is committed to protecting the privacy of individuals and handling personal information in accordance with best practice and Victorian law. Personal information is information about an individual, whether fact or opinion, from which their identity could be reasonably ascertained.

This Policy sets the overarching requirements for how ARV collects, uses, discloses, secures, retains, transfers, and provides access to personal information, ensuring compliance with the *Privacy and Data Protection Act 2014* (Vic) and related legislation. It aligns with the ARV Policy Framework and corporate governance expectations.

2. Scope

This Policy applies to all Alpine Resorts Victoria (ARV) employees, Board members, contractors, consultants, volunteers, and other authorised personnel. It governs the collection, use, disclosure, storage, retention, access, correction, and interstate transfer of personal information, including sensitive and health information handled by ARV or on ARV's behalf. It is based upon DEECAs model policy, which incorporates the model policy issued by the Victorian Public Sector Commission.

The Policy applies whenever ARV undertakes activities involving personal information, such as service delivery, stakeholder engagement, Freedom of Information (FOI) processing, complaints handling, recruitment, and procurement. It covers all ARV resorts and corporate functions, including situations where ARV information is processed in cloud or third-party environments.

This Policy ensures ARV meets statutory obligations, upholds human rights, and maintains community trust in its stewardship of public information. ARV will implement the mandatory requirements outlined in Section 3 and monitor compliance through defined responsibilities (Section 4), consistent with the ARV Policy Framework, Policy Implementation and Management Policy (PIMP).

3. Requirements

ARV must meet the following mandatory requirements:

3.1 Collection

- Collect personal information **only when necessary** for ARV's functions or services, including administration of those functions. Collect information **directly from the individual wherever practicable**, lawfully, fairly, and without undue intrusion. Inform individuals at the time of collection about expected uses/disclosures and any consequences of not providing information.
- Obtain **consent** before collecting **sensitive information**, unless otherwise permitted by law.

3.2 Use and Disclosure

- Use personal information only for the purpose for which it was collected or a related purpose the individual would reasonably expect (for sensitive information, a directly related purpose), unless another specific use has been consented to.
- Disclose personal information when required or authorised by law, or to prevent a serious and imminent threat to an individual's life, health, safety, or welfare.

3.3 Data Quality and Security

- Take reasonable steps to ensure personal information is **accurate, complete, and up-to-date**. Individuals must be provided mechanisms to update their information.
- Protect personal information from **misuse, loss, unauthorised access, modification, or disclosure**, and **securely destroy or de-identify** it when no longer needed. Ensure contracted third parties treat ARV information with equivalent privacy protections via binding agreements.
- Manage records in line with the *Public Records Act 1973* and PROV Standards (e.g., value/risk-based records management, minimum metadata, retention periods).

3.4 Interstate Transfer

- Transfer personal information **outside Victoria only when necessary** for the original purpose or as required by law, and ensure the information receives **equivalent protection**.

3.5 Access and Correction

- Provide individuals the **right to access and correct** their personal information held by ARV. Complex requests will be administered under the *Freedom of Information Act 1982* (Vic); simple requests about small quantities of easily retrievable information may be handled informally. Contact: foi@alpineresorts.vic.gov.au.

3.6 Unique Identifiers and Anonymity

- Do not assign, use, or disclose **unique identifiers** (e.g., licence numbers) unless necessary to carry out ARV functions efficiently; do not adopt another organisation's identifier for a different purpose. Allow **anonymous interactions** where practicable and lawful.

3.7 Privacy by Design

- Conduct **privacy impact assessments (PIAs)** [Privacy-Impact-Assessment-Guide.docx](#) for new or significantly changed processes, systems, or projects that involve personal information. Ensure that appropriate security, retention, and access controls are in place before going live.

4. Responsibilities

Position	Responsibility
ARV Board / ELT	Endorse and champion privacy compliance across ARV; ensure appropriate resourcing and oversight.
Policy Custodian (GM Corporate Services)	Ensures development, implementation, and periodic review per PIMP/PIMG; oversees privacy risk management and training; escalates systemic issues to ELT/Board.
Policy Registrar (Corporate Services)	Maintains the ARV Policy Register and Policy Number Register, ensures approved policies are published on the ARV intranet and website. Contact: policyregister@alpineresorts.vic.gov.au .
Managers and Supervisors	Implement local privacy controls; ensure collection notices are used; validate data quality; report and remediate privacy incidents; enable access/correction processes.
FOI and Privacy Officer	Coordinates FOI requests and privacy complaints; advises on lawful disclosures, exemptions, and redactions; maintains templates and guidance. Contact: foi@alpineresorts.vic.gov.au .
Head of ICT / Information Security	Applies technical and procedural controls for confidentiality, integrity, availability; enforces retention/archival per PROV Standards; supports PIAs being conducted Privacy-Impact-Assessment-Guide.docx
ARV Staff	Handle personal information in accordance with this Policy; complete required privacy training; report privacy incidents promptly.
Contracted Service Providers	Protect ARV personal information under contract; enable audits and compliance assurance.

5. Legislation

- [Privacy and Data Protection Act 2014 \(Vic\)](#)
- [Health Records Act 2001 \(Vic\)](#)
- [Freedom of Information Act 1982 \(Vic\)](#)
- [Public Records Act 1973 \(Vic\)](#)
- [Charter of Human Rights and Responsibilities Act 2006 \(Vic\)](#)

6. Related documents

- [ARV FOI Webpage.docx](#)
- [Managing Records in ARV.docx](#)
- [ARV Policy Framework](#)
- [ARV Policy Implementation and Management Policy](#)

7. Definitions

For the purposes of this policy, the following definitions apply:

Term	Definition
Personal Information	Information about an individual (fact or opinion) from which their identity could reasonably be ascertained.
Sensitive Information	A subset of personal information that includes data such as racial or ethnic origin, religious beliefs, sexual orientation, criminal record, etc.; generally requires consent to collect unless permitted by law.
Unique Identifier	A code (not a person's name) distinguishing an individual (e.g., Tax file number and driver's licence number). ARV will not assign/use/disclose unique identifiers unless necessary to carry out functions efficiently.
Anonymity	Interacting with ARV without identifying oneself, where practicable and lawful.
ARV Staff Member	Any ARV Board member, executive, manager, employee, contractor, volunteer, student on placement, and other personnel at ARV workplaces.
Privacy Impact Assessment (PIA)	A structured assessment identifying privacy risks and controls for new or changed initiatives involving personal information. (Informed by ARV records guidance) Privacy-Impact-Assessment-Guide.docx
De-identification	Techniques that remove or alter personal identifiers so individuals are no longer identifiable, applied before releasing or retaining data beyond required periods.

8. Approval and implementation

Policy Custodian	Policy contact details	Approval Date	Approver
GMCS	policyregister@alpineresorts.vic.gov.au		FRAC

9. Version Control

Version Number			
Document Reference: ARV-CORP-G&R-0085		Policy Custodian:	GMCS
Approved By: Board		Approval Date:	May 2026
Last Amended: June 2026		Next Review Date:	May 2029
Comments: New Policy, 3-year review period.			