



Privacy and Confidentiality Policy

Cedarvale Health and Lifestyle Retreat

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1. Purpose

Cedarvale Health and Lifestyle Retreat (Cedarvale) is committed to protecting privacy, respecting confidentiality and handling personal and health information responsibly. This policy explains how Cedarvale collects, holds, uses, discloses, secures, provides access to and disposes of personal information.

Cedarvale recognises that guests may entrust us with sensitive information concerning their physical health, mental health, disability, medications, dietary needs, spiritual preferences and personal circumstances. We seek to handle this information with dignity, care, transparency and appropriate safeguards.

2. Scope

This policy applies to Cedarvale operations in Victoria and New South Wales, including Cedarvale Yarra Ranges and Cedarvale Kangaroo Valley, and to Cedarvale websites, booking systems, guest portals, programs, accommodation, communications and other services.

It applies to directors, employees, contractors, practitioners, volunteers, students and third-party service providers who collect, access, use, store or process information on

Cedarvale's behalf. It covers information about guests, participants, enquirers, donors, referrers, visitors, applicants, workers and other individuals who interact with Cedarvale.

3. Privacy principles and applicable laws

Cedarvale will handle information in accordance with applicable privacy, health-records, consumer and other legal requirements. Depending on the location and circumstances, these include:

- the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs);
- the Notifiable Data Breaches Scheme under the Privacy Act 1988 (Cth);
- the Health Records Act 2001 (Vic) and the Victorian Health Privacy Principles for health information handled in Victoria; and
- the Health Records and Information Privacy Act 2002 (NSW) and the NSW Health Privacy Principles for health information handled in New South Wales.

Where more than one requirement applies, Cedarvale will seek to meet the applicable requirements and provide appropriate protection for the individual. Nothing in this policy limits any privacy right available under law.

4. Definitions

Term	Meaning
Personal information	Information or an opinion about an identified individual, or an individual who is reasonably identifiable.
Sensitive information	A category of personal information that includes health information, religious beliefs, racial or ethnic origin and certain other protected information.
Health information	Personal information or an opinion about a person's physical or mental health, disability, health services, wishes concerning future health services or other information treated as health information under applicable law.
Confidential information	Non-public personal, health, organisational or business information requiring protection from unauthorised access, use or disclosure.
Data breach	Unauthorised access to, disclosure of, alteration of, loss of or inability to access information, including circumstances that may give rise to notification obligations.
Privacy Officer	The person designated by Cedarvale to oversee privacy compliance, access and correction requests, enquiries and complaints.
Third-party service provider	An external person or organisation that handles information for Cedarvale, such as a booking platform, payment processor, IT provider, professional adviser or contracted practitioner.

5. Information Cedarvale may collect

Cedarvale only seeks to collect information that is reasonably necessary for its functions and activities, or otherwise authorised or required by law. Depending on the individual's interaction with Cedarvale, this may include:

- identity and contact details, including name, address, date of birth, telephone number and email address;
- booking, accommodation, attendance, payment, invoice and transaction information;
- emergency-contact and next-of-kin details;
- dietary requirements, allergies, intolerances, accessibility and mobility needs;
- health history, medications, physical and mental-health information, screening information and relevant risk factors;
- GP, healthcare provider, referral, consent, assessment, counselling, coaching, treatment and program-participation information;
- program outcomes, feedback, surveys and de-identified evaluation information;
- religious or spiritual preferences voluntarily provided for requested spiritual support or program participation;
- incident, injury, safeguarding, complaint, insurance and emergency information;
- photographs, audio or video recordings and testimonials where appropriate permission has been obtained;
- employment, contractor, volunteer, student and background-check information;
- communications, enquiries, correspondence and records of interactions; and
- website, device, cookie, analytics and technical information.

6. How information is collected

Cedarvale generally collects information directly from the individual through its website, Bookinglayer or another booking platform, forms, applications, assessments, telephone or email communications, face-to-face interactions and participation in Cedarvale services.

Information may also be collected from a person authorised by the individual, a parent or guardian, a referring or treating healthcare provider, an emergency contact, a partner organisation, a payment provider, a booking agent, a public source or another person where collection is lawful and reasonably necessary.

Where practicable, Cedarvale will tell the individual at or before collection why the information is being collected, how it may be used or disclosed, whether providing it is required or optional, the consequences of not providing it, and how to access the full policy.

7. Consent and information about children

Cedarvale will seek consent where required, including appropriate consent to collect sensitive information. Consent must be voluntary, informed, current and sufficiently

specific. Cedarvale will not rely on a general privacy-policy acknowledgement as consent for unrelated uses of sensitive information.

Where information concerns a child or a person who cannot provide valid consent, Cedarvale will seek consent from a parent, guardian or other authorised representative where required and will consider the person's capacity, maturity, wishes and best interests. Cedarvale may verify the authority of a representative before acting on instructions or providing access.

8. Purposes for collecting, using and disclosing information

Cedarvale may collect, use or disclose information where reasonably necessary to:

- respond to enquiries and administer applications, bookings, payments, accommodation and services;
- assess whether a program, activity or service is appropriate and can be provided safely;
- provide accommodation, meals, health education, counselling, health coaching, treatments, activities and retreat programs;
- manage dietary requirements, allergies, medications, accessibility needs and health or safety risks;
- communicate with guests before, during and after their stay;
- coordinate services and, with authority where required, communicate with a nominated GP, referrer or other healthcare provider;
- respond to an emergency, serious threat, incident or safeguarding concern;
- maintain service, financial, operational, clinical, insurance and governance records;
- monitor service quality, manage risks and evaluate or improve programs, preferably using de-identified information where practicable;
- manage employees, volunteers, contractors, students and organisational relationships;
- meet legal, regulatory, reporting, safeguarding and insurance obligations; and
- send marketing communications only in accordance with clause 13.

Cedarvale will not use or disclose personal information for an unrelated purpose unless the individual has provided appropriate consent or the use or disclosure is otherwise authorised or required by law.

9. Disclosure and confidentiality

Cedarvale restricts access to information to authorised persons who require it for their role. Personnel and contractors must comply with confidentiality requirements during and after their engagement with Cedarvale.

Where reasonably necessary and lawful, Cedarvale may disclose relevant information to:

- authorised Cedarvale personnel and contracted practitioners involved in providing or supporting services;
- the individual's nominated GP, healthcare provider, referrer, representative or support person, where authorised;

- emergency services, healthcare providers or appropriate persons where necessary to respond to a serious threat to health or safety;
- booking, payment, communications, data hosting, IT support, records-management and other contracted service providers;
- professional advisers, auditors, insurers and risk-management providers;
- government agencies, regulators, courts or law-enforcement bodies where authorised or required; and
- another entity involved in a proposed or actual organisational transfer, only where lawful and subject to appropriate safeguards.

Cedarvale does not sell personal information. Cedarvale does not disclose information merely because a family member, friend, church, donor, employer or referring organisation requests it. Appropriate authority, consent or another lawful basis is required.

10. Bookinglayer and other service providers

Cedarvale uses external service providers to support booking, payment, communications, data storage, website, assessment and administrative functions. These providers may process information on Cedarvale's behalf and may have their own legal obligations.

Cedarvale will take reasonable steps to select appropriate providers, limit access to information, establish contractual or confidentiality protections where appropriate, configure systems securely and review provider arrangements. Individuals should also review any separate privacy information presented by a provider when interacting directly with that provider.

11. Cross-border disclosure and storage

Some technology or service providers may store information, provide support or permit authorised access from outside Australia. Before using or continuing material arrangements, Cedarvale will seek information about relevant hosting locations, access arrangements and subcontractors and will take reasonable steps required by applicable law to protect information.

Information about likely overseas locations known to Cedarvale at the time of an enquiry may be requested from the Privacy Officer. Cedarvale will update this policy where its material overseas handling arrangements change.

12. Data quality, security, retention and destruction

Cedarvale takes reasonable steps to ensure information is accurate, complete, current and relevant for the purpose for which it is used. Individuals are encouraged to tell Cedarvale when their information changes.

Cedarvale uses reasonable physical, organisational and technical safeguards appropriate to the nature of the information and the risks involved. Measures may include role-based access, passwords and multi-factor authentication where available,

secure storage, confidentiality obligations, staff training, backups, system maintenance and controlled disposal.

Information is retained only for as long as reasonably required for service, legal, insurance, clinical, safeguarding, financial and operational purposes. When no longer required and where no law requires retention, Cedarvale will take reasonable steps to securely destroy or de-identify it. De-identified information may be retained for service evaluation, reporting, research or planning where individuals are not reasonably identifiable.

13. Direct marketing and fundraising communications

Cedarvale may send news, health education resources, program information, fundraising communications or promotional material where the individual has consented or where otherwise permitted by law. Marketing consent is optional and is not a condition of receiving Cedarvale services.

Cedarvale will not use health or other sensitive information for direct marketing without appropriate consent. Every electronic marketing communication will provide a practical method to unsubscribe. An individual may withdraw marketing consent at any time without affecting their services or booking.

14. Photography, recordings, stories and testimonials

Cedarvale will seek separate, voluntary and appropriately specific consent before using an identifiable guest's photograph, recording, story, testimonial or sensitive information for promotional purposes. Declining media consent will not affect access to services.

An individual may withdraw consent for future use by contacting Cedarvale. Withdrawal may not be capable of reversing material already lawfully printed, published or distributed. Cedarvale will apply particular care to photography or stories connected with counselling, mental-health programs, children and other sensitive settings.

15. Website privacy, cookies and analytics

Cedarvale websites and booking services may collect technical information such as IP address, browser type, device information, pages visited, referral source and interaction data. Cookies or similar technologies may be used for security, essential website functions, preferences, booking processes, performance measurement and analytics.

Where required, Cedarvale will provide suitable notice or choice regarding non-essential cookies. Third-party services may collect information under their own privacy terms. Cedarvale's website should identify material analytics, advertising and embedded-service providers through its cookie notice or privacy information.

16. Access and correction

An individual may request access to personal or health information Cedarvale holds about them and may ask Cedarvale to correct information that is inaccurate, out of date,

incomplete, irrelevant or misleading. Requests should be made in writing to the Privacy Officer.

Cedarvale may need to verify identity and authority before acting. Cedarvale will respond within the period required by applicable law and will provide access in an appropriate form where reasonably practicable. If Cedarvale lawfully refuses access or correction, it will provide reasons and information about available complaint mechanisms, where required.

Cedarvale will not charge for making an access or correction request. A reasonable charge may apply for providing access where permitted by law, but it will not be excessive or used to discourage access.

17. Privacy enquiries and complaints

Privacy enquiries, access or correction requests, and complaints may be directed to:

Privacy Officer

Cedarvale Health and Lifestyle Retreat

Via the contact details published on Cedarvale's website or the relevant Site Manager

A complaint should describe the concern and include sufficient information for Cedarvale to investigate. Cedarvale will acknowledge the complaint, investigate it fairly, restrict information about it to those who need to know, and provide a response within a reasonable period.

If the individual is dissatisfied with Cedarvale's response, they may be entitled to contact the Office of the Australian Information Commissioner or the relevant Victorian or New South Wales privacy or health complaints body. Current external contact information is available from the relevant regulator's website.

18. Data breaches

Suspected or actual privacy and data-security incidents must be reported promptly to Cedarvale management and the Privacy Officer. Cedarvale will contain and assess the incident, take remedial action, preserve appropriate records and determine whether notification is required under the Notifiable Data Breaches Scheme or another applicable law.

Where notification is required, Cedarvale will notify affected individuals and the relevant regulator as required and provide practical information about recommended protective steps.

19. Roles and responsibilities

19.1 Board of Directors

- Provide governance and oversight of privacy, confidentiality and information-security risk.
- Approve this policy and receive material breach or compliance reporting.

- Ensure appropriate risk-management and accountability arrangements are maintained.

19.2 Management and Privacy Officer

- Implement this policy and supporting procedures.
- Maintain privacy notices, consent mechanisms, provider oversight, training and access controls.
- Respond to enquiries, access and correction requests, complaints and incidents.
- Review privacy risks when systems, services, forms, partnerships or legal requirements change.

19.3 Staff, volunteers, students and contractors

- Collect and access only the information required for authorised duties.
- Use secure systems and follow privacy, confidentiality and records-management procedures.
- Do not discuss, copy, photograph, download or disclose information without authority.
- Report suspected breaches, loss, unauthorised access or inappropriate disclosure immediately.
- Maintain confidentiality during and after their engagement with Cedarvale.

19.4 Third-party service providers

- Handle information only for authorised purposes and in accordance with applicable obligations.
- Maintain reasonable security and confidentiality controls.
- Notify Cedarvale promptly of incidents, requests or risks affecting Cedarvale information.
- Return, delete or manage information at the end of the arrangement as contractually and legally required.

20. Policy availability, review and changes

Cedarvale will make the public version of this policy available free of charge on its website and in another appropriate form on request. Short privacy collection notices will be provided at relevant collection points, including Bookinglayer, health screening, referral and assessment forms.

This policy will be reviewed at least every two years and earlier where there is a material change to law, systems, services, information practices, providers, risk or organisational structure. Material changes will be approved through Cedarvale's QMS document-control process.

21. Related Cedarvale documents

- Privacy, Confidentiality and Data Breach Procedure;
- Code of Conduct;

- Records Management and Retention Schedule;
- Information Security or Cybersecurity Procedure;
- Consent, Photography and Media Forms;
- Incident Management and Safeguarding Procedures;
- Booking Terms and Conditions; and
- Bookinglayer and website privacy collection notices.

22. External references

- [Office of the Australian Information Commissioner - Australian Privacy Principles](#)
- [Victorian Department of Health - Health Records Act](#)
- [Information and Privacy Commission NSW - HRIP Act](#)

23. Modification history

Version	Date	Approved by	Description of changes
1.0	March 2025	Board of Directors	Initial policy.
2.0	On approval	Board of Directors	Expanded for Victorian and NSW operations; added consent, service-provider, cross-border, marketing, media, cookies, access, complaints, retention and breach provisions.