

1. WE RESPECT YOUR PRIVACY

- 1.1. This Privacy Statement sets out the policy of Urban Jungle Indoor Rock Climbing with respect to the way in which we collect, use, disclose, store, secure and dispose of Personal Information about our customers and employees including through our website at www.urbanjungleirc.com. Urban Jungle Indoor Rock Climbing is bound by the Australian Privacy Principles (APPs) contained in the *Privacy Act 1988* (Cth).
- **1.2.** Urban Jungle Indoor Rock Climbing is dedicated to ensuring that personal and sensitive information is gathered with respect to the individual and aims to exercise the highest standard of care in preserving privacy of information in all areas of operation. All information about individual health collected by Urban Jungle Indoor Rock Climbing is handled in accordance with applicable Federal and State health records legislation.
- **1.3.** "Personal Information" is information we hold which is identifiable as being about you. "Sensitive Information" means health information about you.

2. COLLECTION OF PERSONAL AND SENSITIVE INFORMATION

- **2.1.** The types of Personal Information generally collected by us include name, address, date of birth, mobile and telephone numbers, email addresses, credit card or bank account details, occupation and employer, driver's licence number and emergency contact details. Personal information is also collected when individuals provide business cards or other documentation to us containing such Personal Information, including completion of a Membership Agreement and a Health Questionnaire. Personal Information also includes information we collect in the course of providing services to individuals and external communications.
- **2.2.** The types of Sensitive Information generally collected by us include information relating to health issues that is necessary to properly advise customers about fitness activities. The types of health related information include medical history, whether individuals are using medication, smoke or are pregnant and other health related information. We will obtain specific consent in circumstances where it is necessary to collect Sensitive Information.
- **2.3.** Urban Jungle Indoor Rock Climbing collects personal information from you in a variety of ways, including when you interact with us electronically or in person, when you access our website and when we provide services to you. We may receive personal information from third parties. If we do, we will protect it as set our in this Privacy Policy.

3. USE OF YOUR PERSONAL AND SENSITIVE INFORMATION

- **3.1.** Any Personal or Sensitive Information that we collect about you will be used by us to provide you with information, updates and our services. We may also make you aware of new and additional products, services and opportunities available to you. We may use your information to improve our products and services and better understand your needs.
- **3.2.** Urban Jungle Indoor Rock Climbing may contact you by a variety of measures including, but not limited to telephone, email, sms or mail.

4. DISCLOSURE OF YOUR PERSONAL AND SENSITIVE INFORMATION

- **4.1.** We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this Policy. Personal and Sensitive Information is only supplied to a third party when it is required for the delivery of our products or services.
- 4.2. Personal or Sensitive Information that is in our possession is not subject to rent, sale or any other disclosure to any other company or organisation, without prior consent of individuals where that consent is required by law.



- 4.3. We reserve the right to transfer to the extent permissible by law our user databases, together with any personal information and non-personal information contained in those databases, where it is incidental to a sale of our business to a third party.
- **4.4.** We may from time to time need to disclose personal and sensitive information to comply with 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.
- **4.5.** By providing us with personal information, you consent to the terms of this Privacy Policy and the types of disclosure covered by this Policy. Where we disclose your personal information to third parties, we will request that the third party follow this Policy regarding handling your personal information.

5. INFORMATION PROVIDED BY EMPLOYEES

- 5.1. Any employment application provided to the Urban Jungle Indoor Rock Climbing will be used solely for the purpose of analysing suitability for a position available. Personal details will only form part of an employee record if application is successful. The information about employees will only be disclosed by Urban Jungle Indoor Rock Climbing if required by law to authorised government agencies i.e. Australian Taxation Office or as otherwise directed by employee.
- 5.2. Any unsuccessful applications will remain on file to be revisited should suitable opportunities arise in the future and if required by the applicant applications may be returned or destroyed.

6. WEBSITE / ONLINE PRIVACY

- 6.1. The Privacy Policy outlines our approach to online privacy issues regarding Personal Information collected through our website www.urbanjungleirc.com.
- 6.2. Urban Jungle Indoor Rock Climbing will handle personal information collected online with the utmost care and will not knowingly use it in ways not explicitly consented to by the user who supplied the information and to whom the information refers.
- 6.3. Urban Jungle Indoor Rock Climbing will handle Personal Information collected online consistently with the way that it handles Personal Information collected offline. Other matters specific to our handling of Personal Information online are set out below.

6.3.1. Cookies

We may collect certain data that does not identify individuals (sometimes called "web log information") when they visit certain pages (such as the type of browser and operating system they have). We may also use "cookies" which are small files that are stored on computer and that manage the security and navigation process of the site. Users can choose to block these cookies, but some portions of the site may not function correctly if they do. This type of data is collected for statistical purposes only, and while cookies will identify a computer, they are unlikely to identify users personally.

6.3.2. Email/SMS marketing

We will not distribute our marketing material via SMS unless customers have consented to this. This is a requirement of the Spam Act 2003. Further, customers can unsubscribe from our e-newsletter or other bulletins by using the "unsubscribe" facility contained in each electronic publication we send.

Occasionally, Urban Jungle Indoor Rock Climbing will send promotional email messages to prospective customers to market a service or activity. This will only be done on the reasonable belief that customers would be interested in the subject matter. In every case, customers will be provided with clear and simple instructions on how to be removed from our mailing list.

6.3.3. Site security policy

Our website uses up-to-date technology to maximise the security of user's Personal Information. Urban Jungle Indoor Rock Climbing places great importance on the security of all information associated with our customers. Our security and privacy policy are continually reviewed and updated; the user information is accessed by authorised personnel. We aim to prevent accidental manipulation, destruction, use, disclosure loss or unauthorised access of data.



6.3.4. Hyperlinks to other websites

- Our web site contains links to other web sites which we do not control; they are not covered by our Privacy Policy. If users access other websites using the links provided, operators may collect information from users and use it in accordance with their privacy policy, which may differ from ours. We have no control over the types of information the site owners choose to collect and how they use it.
 - 6.3.5. Social Networking Acceptable Use Policy
- Urban Jungle Indoor Rock Climbing encourages all comments on any of our social networking pages (Facebook, Instagram, YouTube), as we would like to hear from our fans, clients, friends and staff. Customer views, news, ideas, insights and criticisms about Urban Jungle Indoor Rock Climbing are very important to us, yet the social networking sites must not be used to abuse others, expose others to offensive or inappropriate content, or for any illegal purpose.
- It is the user's responsibility to protect their personal privacy when using our social networking pages. We advise users not to include any Personal Information of either themselves or of others in their posts to the wall (such as email addresses, private addresses or phone numbers).
- In addition, it is recommended to refrain from posting materials to the page that infringe the intellectual property rights of others and not to include internet addresses or links to websites, or any email addresses in posts to the wall.
- Any information posted to the Urban Jungle Indoor Rock Climbing Social Networking pages (Facebook, Instagram, YouTube) is recorded and used for the purpose of administering pages and addressing any comments made, while no attempt will be made to identify users except where authorised by law.
- We are not responsible for the privacy practices or content of social networking pages (Facebook, Instagram, YouTube). The responsibility of Urban Jungle Indoor Rock Climbing is limited to our own postings made on our Facebook page "Urban Jungle Indoor Rock Climbing".

7. SECURITY

- 7.1. Urban Jungle Indoor Rock Climbing is committed to ensuring that the information you provide to us is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.
- 7.2. The transmission and exchange of information is carried out at your own risk. We cannot guarantee the security of any information that you transmit to us or receive from us. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that personal information that we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

8. CHANGES TO PRIVACY POLICY

8.1. Urban Jungle Indoor Rock Climbing reserve the right to change this Privacy Policy without prior notice. Changes will be effective immediately upon our posting of the changes on our website or notice board. Please check back from time to time to review our Privacy Policy.

9. ACCESS TO YOUR PERSONAL AND SENSITIVE INFORMATION

- 9.1. You may request details of personal information that we hold about you in accordance with provisions of the *Privacy Act 1988* (Cth). A small administrative fee may be payable for the provision of information. If you would like a copy of information which we hold about you or believe that any information we hold on you is inaccurate, out of date, incomplete, irrelevant or misleading, please email us at admin@urbanjungleirc.com. If you do not wish us to hold your information, please email us at admin@urbanjungleirc.com and we will remove all such information about you from our database.
- 9.2. We reserve the right to refuse to provide you with information that we hold about you, in certain circumstances set out in the *Privacy Act 1988* (Cth.)



10. COMPLAINTS ABOUT PRIVACY

10.1. If you have complaints about our privacy practices, please feel free to provide details of your complaints to Urban Jungle Indoor Rock Climbing as follows:

By letter:

By email: admin@urbanjungleirc.com

We take complaints very seriously and will respond shortly after receiving written notice of your complaint.

11. CCTV CAMERAS AND SURVEILLANCE

- **11.1.** We undertake an ongoing video recording in Urban Jungle Indoor Rock Climbing gym for the purpose of ensuring security via CCTV cameras, recording the time and date at which images are taken. Video recordings can be accessed only by authorised staff.
- **11.2.** Video recordings of a specific incident may be released to the WA Police Service only under the terms of this policy or subject to the execution of a search warrant or other legal process and only with the approval of Urban Jungle Indoor Rock Climbing Company Director.

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