

<b>Document reference:</b>	<b>SAGE Study Tours Privacy Policy</b>
<b>Approved by:</b>	Cynthia Payne, Managing Director
<b>Date developed:</b>	March 2026
<b>Review date:</b>	March 2027

**Preamble**..... 1

**Purpose**.....2

**Legislative / Compliance Obligations**..... 2

**Introduction / background**.....2

    Employees and Contractors..... 2

    Tour Participants / Delegates..... 3

    Partner Organisations and Host Sites.....4

**Policy statement**.....4

## Preamble

This is the policy of SAGE Study Tours, operated by Ozability Pty Ltd (ABN 51 161 471 496) trading as SAGE Tours, a brand under the Anchor Impact Group Pty Ltd, collectively referred to as 'SAGE Study Tours' or 'SAGE'.

SAGE Study Tours is a world leader in the seniors living industry, offering unique international study tours to aged care and retirement living providers. SAGE is bound by the 13 Australian Privacy Principles (APPs), as set out in the Privacy Act 1988 (amended by the Privacy Amendment (Enhancing Privacy Protection) Act 2012).

To comply with our obligations under the APPs, SAGE Study Tours has a Privacy Policy, which sets out how we manage privacy in our organisation. Any relevant person wishing to receive more information about the operational aspects of this policy can seek that information from the Managing Director who is the Privacy Officer for SAGE Study Tours.

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## **Purpose**

To ensure that SAGE Study Tours' Privacy Policy and Procedures are clearly documented and understood by employees and contractors and to ensure that personal information is collected, used, stored and disclosed by SAGE Study Tours in accordance with legal requirements.

## **Legislative / Compliance Obligations**

Privacy Act 1988 (amended by the Privacy Amendment (Private sector) Act 2000 and the

Privacy Amendment (Enhancing Privacy Protection) Act 2012) Privacy and Personal Information Act 1988

Australian Privacy Principles Guidelines, Office of the Australian Information Commissioner, Privacy (Persons Reported as Missing) Rule 2014

Tax File Number Guidelines 2011

Australian Consumer Law (Schedule 2 of the Competition and Consumer Act 2010)

## **Introduction / background**

SAGE Study Tours collects and holds the following types of personal information:

### ***Employees and Contractors***

- Name
- Date of Birth
- Address
- Occupation
- Career history
- Application for Employment
- Immunisation records
- References

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- Tax file number
  - Banking details
  - HR/Personnel Records
  - Workers compensation or injury information
  - Working with Children check
  - Police check
  - Immigration status report
  - Garnishee orders
  - Superannuation
  - Professional registration details
  - Car registration

### ***Tour Participants / Delegates***

- Full name (as per passport), date of birth, gender and nationality
- Residential and business address
- Contact details (email, phone)
- Passport details (including passport number) and travel document information
- Visa, entry permits and immigration documentation
- Travel insurance details and policy numbers
- Dietary requirements and food allergies
- Pre-existing medical conditions, health information and mobility requirements relevant to travel
- Vaccination and medical permits required for entry to destination countries

- Emergency contact details
- Employer and professional role information
- Travel preferences and accommodation requirements
- Photographs and video recordings taken during tours
- Feedback and survey responses
- Financial and billing information (tour fees, deposits, payment records)
- Information that we obtain about you in the course of your interaction with our website including your internet protocol (IP) address, the date and time of your visit to our website, the pages you have accessed, the links on which you have clicked and the type of browser that you were using
- Aggregated statistical data which is information relating to your use of our website and our services, such as traffic flow and demographics

### ***Partner Organisations and Host Sites***

- Organisation name and contact details
- Key contact persons (name, role, email, phone)
- Site visit arrangements and logistics information

## **Policy statement**

SAGE Study Tours takes its obligations under the Privacy Act seriously and will take all reasonable steps in order to comply with the Act and protect the privacy of personal and sensitive information that we hold. This policy sets out how we will achieve this.

The policy applies to all persons involved in our organisation. This includes prospective candidates for employment, employees, contractors, tour participants, partner organisations and any person who provides us with their personal information.

### **1. Collection**

SAGE Study Tours will only collect information if it is necessary for our functions and activities, including the planning, coordination and delivery of international study tours. When we do so, we will inform the individual about what the information will be used for. In most cases we will only collect information directly from the individual (or the responsible person, as appropriate) and where information is collected from someone else, we will inform the individual (or the responsible person, as appropriate) if practicable.

Information is collected by fair and lawful means and in accordance with our obligations under State and Federal legislation. Other information collected concerning employees is collected to ensure compliance with tax office obligations, immigration legislation and industrial instruments, and the like.

Personal information of tour participants is collected primarily through the SAGE Tours Booking Form (one form per individual traveller) and through direct communication with SAGE representatives. Information is collected for the purposes of arranging travel, accommodation, site visits, dietary and medical requirements, travel insurance validation, and ensuring the safety and wellbeing of delegates during international tours. In accordance with the SAGE Tours Conditions of Travel (clause 2), by making a Booking, participants consent to SAGE using their information in line with this Privacy Policy, including disclosing information to agents, service providers and other suppliers to enable SAGE to provide the tour.

### **2. Use and Disclosure**

SAGE Study Tours will only use or disclose personal information relating to tour participants, clients or employees for the primary purpose of collection, a related purpose for which it was collected (and which would be reasonably expected) or a purpose to which the individual (or the responsible person, as appropriate) has consented.

Personal information may be provided to the following as part of provision of services:

- Business First Travel, SAGE Tours' designated booking and travel agent (unless otherwise stipulated), who may assist with bookings, flights, travel documentation and personal travel insurance. Business First Travel operates under its own terms and conditions and privacy policy. Participants who use Business First Travel's services do so subject to those terms.
- Other third-party travel service providers including airlines, hotels, accommodation providers, ground transport and coach/transfer companies, activity providers, local tour guides and travel insurance providers engaged by SAGE Study Tours to deliver tour services. Although SAGE takes all reasonable steps to select reputable third-party suppliers, these providers may operate under their own terms and conditions. In

circumstances where disclosure is necessary, these providers are required to handle personal information in accordance with applicable privacy laws.

- International host organisations, clinical sites, educational institutions and aged care/retirement living providers visited during study tours, to the extent necessary to facilitate site visits and delegate participation
- Funding bodies and other government agencies as required by Commonwealth and State legislation
- The person designated by the tour participant as their emergency contact or authorised representative
- Personal information relating to tour participants and employees will not be used for other purposes such as fundraising or marketing activities without seeking written consent of the individual
- The use or disclosure is required or authorised by law
- SAGE Study Tours reasonably believes that the use or disclosure is necessary to lessen or prevent a serious or imminent threat to an individual's life, health or safety, or a serious threat to public health or safety
- If SAGE Study Tours has reason to believe that an unlawful activity has been, is being or may be engaged in

### 3. Quality of Information

SAGE Study Tours will take all reasonable steps to ensure that the personal information it collects, uses or discloses is accurate, complete and up to date and is relevant for the purpose of the collection, use or disclosure.

### 4. Security of Information

SAGE Study Tours takes all reasonable steps to protect the personal information it holds from misuse and loss and from unauthorised access, modification or disclosure. However, SAGE Study Tours cannot guarantee the security of any personal information transmitted to us via the Internet.

SAGE Study Tours holds all personal information of tour participants and employees in a secure and confidential manner.

SAGE Study Tours destroys all personal information it no longer requires for any purpose for which the information may be used or disclosed under Part 2 of this Policy.

- Secure disposal of electronic records will include:
  - Overwriting records before they are deleted and
  - Deleting backup files
- Secure disposal of paper based records will include:
  - Shredding of paper files or
  - Contacting an authorised disposal company for secure disposal

In situations where it is necessary to retain the personal information, it will be permanently de-identified by removing from the record any information by which a tour participant/employee may be identified.

### **5. Openness**

This Privacy Policy clearly expresses SAGE Study Tours' management of personal information, and this Policy is available to any person who requests a copy.

On written request, SAGE Study Tours will take all reasonable steps to explain generally what sort of personal information it holds, for what purposes, and how it collects, holds, uses and discloses that information.

### **6. Access to or correction of personal information**

SAGE Study Tours provides access to the personal information that we hold about tour participants and employees. Access will be provided in accordance with the Australian Privacy Principles.

All reasonable steps will be taken to provide access.

Requests for corrections to personal information held by SAGE Study Tours may be made in writing to the Privacy Officer.

SAGE Study Tours will provide a reason for the denial of access or refusal to correct personal information.

### (1) Tour Participant Access

Access is granted to individuals who have participated in or registered for a SAGE Study Tour upon written request through the Privacy Officer.

SAGE Study Tours is not required to provide access when:

- the request is vexatious or frivolous
  - it requires access that would be unlawful
    - the information would reveal SAGE Study Tours' intention in relation to negotiations
    - it concerns information related to an existing or anticipated legal proceeding
    - it would detrimentally affect the privacy of another individual
    - would pose a serious threat to an individual's life or health
    - the information was given in confidence

### (2) Employee Access

Access is granted to employees of SAGE Study Tours upon written request through the Privacy Officer.

SAGE Study Tours is not required to provide access when:

- the request is vexatious or frivolous
  - it requires access that would be unlawful
    - the information would reveal SAGE Study Tours' intention in relation to negotiations
    - it concerns information related to an existing or anticipated legal proceeding
    - it would detrimentally affect the privacy of another individual

- would pose a serious threat to the employee's life or health
- the information was given in confidence

### 7. Anonymity

SAGE Study Tours gives individuals the option of not identifying themselves where it is lawful or practicable. However, due to the nature of international travel arrangements, it is generally not practicable for tour participants to remain anonymous as personal identification (including full name as per passport, date of birth, nationality and passport number) is required for travel bookings, visa applications, entry permits and site visit registrations. For travel advice, participants are encouraged to contact the Department of Foreign Affairs and Trade or visit [www.smartraveller.gov.au](http://www.smartraveller.gov.au).

### 8. Transborder Data Flows

Due to the international nature of SAGE Study Tours' operations, SAGE Study Tours regularly transfers personal information about tour participants to recipients in foreign countries for the purposes of arranging and delivering study tours. This may include transfers to:

- Hotels, airlines and ground transport operators in the destination country
- Host organisations, aged care providers and educational institutions in the destination country
- Local tour operators and guides
- Foreign government authorities where required for visa or entry purposes

SAGE Study Tours will take all reasonable steps to ensure that personal information transferred overseas is handled in accordance with the Australian Privacy Principles. Transfers will occur where:

- SAGE Study Tours reasonably believes that the recipient of the information is subject to a law, binding scheme or contract which upholds principles for handling the information that are substantially similar to the Australian Privacy Principles
- The individual gives informed consent
- It is not practicable for the individual to give consent, but the transfer of information is for his or her benefit

- Transfer is necessary for performance of a contract between the individual and SAGE Study Tours
- Transfer is necessary for performance of a contract between a third party and SAGE Study Tours and is in the interests of the individual
- Action is required in relation to an unlawful activity
- Disclosure is required by law

The countries to which information is sent will depend on the tour destination. Tour participants will be informed of the relevant destination countries prior to tour departure. Past and future tour destinations have included countries across Europe, Asia, Africa, North America and the United Kingdom.

If it becomes necessary to store or disclose personal or sensitive information outside of Australia, where practicable an indemnity will be sought from the recipient of the information, which indemnifies SAGE Study Tours against claims for the recipient's breach of the Privacy Act.

### 9. Sensitive Information

Sensitive information refers to:

- an individual's racial or ethnic origin
- health information
- political opinions
- membership of a political association, professional or trade association or trade union
- religious beliefs or affiliations
- philosophical beliefs
- sexual orientation or practices
- criminal record
- genetic information
- biometric information that is to be used for certain purposes

- biometric templates.

SAGE Study Tours will not collect, use or disclose sensitive information about a tour participant, emergency contact or employee unless:

- They have consented; or
- The collection, use or disclosure is required by law; or
- The collection, use or disclosure is necessary to prevent or lessen a serious and imminent threat to the life or health of any individual.

SAGE Study Tours may collect health information from tour participants where necessary to ensure the safety and suitability of travel arrangements, including dietary requirements, mobility needs, vaccination status, medical permits and any pre-existing medical conditions that may affect the participant's ability to attend a SAGE Tour (as required under clause 2(c) of the Conditions of Travel). Such information is collected with the participant's consent and is used solely for the purpose of ensuring their safety and wellbeing during the tour. Participants are responsible for advising SAGE of any special requirements (e.g. special meals, medical requirements) at the time of Booking.

### **10. Complaints process**

If there is a complaint regarding the information that SAGE Study Tours is collecting or has collected, or a person believes there is a breach of this policy or the Privacy Legislation, a written complaint should be made to the Privacy Officer ([privacy@sagetours.com](mailto:privacy@sagetours.com)).

### **11. Debt Collection**

SAGE Study Tours has a policy in relation to the collection of debts. Tour participants who do not pay their fees on time may be subject to their personal information being given to a debt collection agency.

### **12. Direct Marketing**

Personal information may be used to assist SAGE Study Tours with direct marketing, for example to enhance our service and keep tour participants and prospective delegates informed by sending newsletters and information about upcoming tours.

Individuals have the right to:

- Elect not to receive direct marketing material from us
- Direct us not to use or disclose information for purposes of direct marketing by other organisations
- Request us to provide the source of the information used for direct marketing.

### 13. Emergencies and Disasters

This part applies to situations when the Prime Minister or a Minister of the Australian government has issued a written and published declaration of an emergency or disaster of national significance and which has affected one or more Australian citizens or permanent residents (Declaration).

When a Declaration has been issued, we may collect, use or disclose personal information without having to comply with ordinary Privacy Act rules only for the following purposes:

- identifying those are or might be injured, missing, dead or involved in the emergency
- helping individuals to get services including repatriation, medical or other treatment, health, financial or other humanitarian aid
- helping law enforcement
- coordinating or managing the emergency
- making sure that people who are responsible for individuals are kept appropriately informed about them and the emergency response to those individuals.

Only to the following organisations:

- a State or Territory authority
- the use or disclosure is not contrary to any wish expressed by the person reported as missing of which we are aware, and
- we do not believe that the use or disclosure would pose a serious threat to the life, health or safety of the individual
- an entity involved or likely to be involved in managing or assisting in managing the emergency or disaster, or
- a person who is 'responsible' for the individual, or

- a Minister; or
- a Department; or
- certain bodies or tribunals established or appointed for a public purpose by or under a Commonwealth enactment; or
- a body established or appointed by the Governor-General, or by a Minister, otherwise than by or under a Commonwealth enactment; or
- a person holding or performing the duties of an office established by or under, or an appointment made under, a Commonwealth enactment, other than a person who, by virtue of holding that office, is the Secretary of a Department; or
- a person holding or performing the duties of an appointment, being an appointment made by the Governor-General, or by a Minister, otherwise than under a Commonwealth enactment; or
- a federal court; or
- the Australian Federal Police; or
- Norfolk Island agency; or
- the nominated AGHS company; or
- an eligible hearing service provider; or
- the Chief Executive Officer of Medicare Australia.

Only in the following situations:

- we believe that the individual is involved in the emergency or disaster; and
- there are limits on the entities that the information can be disclosed to; and
- these entities must be directly involved in providing specific services, such as repatriation, medical, health, financial or other humanitarian assistance.

If possible, queries regarding extraordinary handling of personal and sensitive information where there has been a Declaration should be referred at first instance to the Privacy Officer.

In addition, SAGE Study Tours maintains emergency response procedures for incidents occurring during international tours. In an emergency situation while on tour (including medical emergencies, natural disasters, civil unrest or other incidents), SAGE Study Tours may disclose personal and health information of tour participants to local emergency services, medical providers, consular officials and the participant's designated emergency contact, to the extent necessary to protect the life, health or safety of the individual.

### **14. Unsolicited information**

If we receive unsolicited personal information, we will:

- Determine whether the information could have been collected in compliance with Part 1 of this Policy; and
- If the answer is no, then destroy or de-identify the information; or

If the answer is yes, then provide the individual with a privacy statement and consent form and otherwise handle the information in accordance with this Policy

### **15. Email communication where sensitive and private information contained**

Emails that are sent outside SAGE Study Tours' platform, then in every instance the email sender must determine if sensitive and confidential information is contained in the email or in an attachment.

If sensitive or confidential email is included, then in the Email header is to contain the following statement [This email contains sensitive or confidential information]

### **16. Photography and Media**

SAGE Study Tours may photograph or video-record activities during study tours for the purposes of marketing, reporting, educational resources and social media. Tour participants will be informed of this practice and their consent will be sought. Participants have the right to opt out of being photographed or recorded. Any images or recordings will be used in accordance with this Privacy Policy and will not be disclosed to third parties without consent, except where required for legitimate business purposes or by law.

### **17. Tour Booking, Cancellation and Refund Records**

SAGE Study Tours retains personal and financial information related to tour bookings, deposits, cancellations and refunds in accordance with the SAGE Study Tours Conditions of Travel. Key provisions include:

- A non-refundable deposit is required per individual traveller per trip to confirm a Booking (Conditions of Travel, clause 4)
- Subject to Australian Consumer Law, payments made in relation to a Booking are generally not refundable once paid (Conditions of Travel, clause 6)
- SAGE may at its absolute discretion offer a refund for a cancellation, subject to unrecoverable fees and cancellation charges (which can be up to 100% of the cost of the Booking)
- In the case of cancellation by SAGE (other than due to Force Majeure), SAGE may offer alternative tour departures or a full refund (Conditions of Travel, clause 7)
- In the case of cancellation due to a Force Majeure Event, SAGE may offer a 100% credit or a refund minus unrecoverable fees
- It is a condition of Booking that each individual takes out personal travel insurance (Conditions of Travel, clause 8)

This information is retained for the period necessary to fulfil contractual obligations and comply with applicable tax and consumer protection legislation.

### **18. Privacy Data Breaches**

In the event that your Personal Information is lost, stolen or subject to unauthorised access or disclosure, SAGE Study Tours will implement the Data Breach Response Plan and will also adhere to its obligations under the Privacy Act in relation to any required notifications to the Office of the Australian Information Commissioner and to those people whose Personal Information has been lost, stolen or subject to authorised access or disclosure.