

## GOV - 011 Privacy Policy

<b>Authorised by: Board</b>
<b>Applies to: All Board members and employees, volunteers and contractors who handle personal information</b>
<b>Effective from: 13 January 2022</b>
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<b>Policy Owner: Chief Executive Officer</b>

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## 1. Privacy Policy

People with Disability Australia and its related bodies corporate (**we, our, us**) recognise the importance of protecting the privacy and the rights of individuals in relation to their personal information, and your rights to privacy under the *Privacy Act 1988* (Cth) (**Privacy Act**). This document is our privacy policy and it tells you how we handle your personal information.

### 1.1 What Is Your Personal Information?

We use the meaning of “personal information” that is in the Privacy Act. In general terms, “personal information” is any information or an opinion about you that can be used to personally identify you. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

“Sensitive Information” is a type of personal information and is also defined under the Privacy Act. It includes things like your health information, ethnic origin, sexual orientation and criminal history.

### 1.2 What Personal Information Do We Collect?

We may collect the following types of personal information from you:

- name;
- mailing or street address;
- email address;
- telephone number;
- facsimile number;
- age or birth date;
- profession, occupation or job title;
- if you are a member of our organisation, information about your interests;
- if you choose to share your story with us, information about your life experiences;
- details about how you have engaged with us, including details about whether you have used, purchased or enquired about any of the products and services that we offer, together with any additional information necessary to deliver those products and services to you and to respond to your enquiries;

- other forms of personal information about you where you elect to respond to surveys that we may send to you from time to time; and
- information and feedback about your experience of our products and services.

We may also collect and hold other personal information that you choose to provide to us.

We may collect sensitive information from you, including:

- information about medical conditions, disabilities, or health needs that you have;
- information about your membership of schemes such as the National Disability Insurance Scheme (**NDIS**);
- health-related experiences that you have had;
- your sexual orientation and ethnicity; and
- if you use our individual advocacy services, we may collect additional sensitive information about you, including your criminal history.

We may also collect some information from you that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how users use our website.

### 1.3 How Do We Collect Your Personal Information?

We collect your personal information directly from you unless it is unreasonable or impracticable to do so. We may collect personal information from you in different ways, including when you:

- complete a membership application, apply for a Qantas Carer Concession Card, or make a donation;
- make enquiries about our products and services, or ask us for information;
- use or engage with our services or our work, for example when you use our individual and group advocacy services, participate in our systemic advocacy activities or professional education and training packages, or if you are involved in our research activities;
- respond to any questionnaires or surveys conducted by us;
- write stories on our behalf or provide us with details of your experiences;

- participate in any event or activity organised or run by us; or
- contact us by any method, such as telephone, email, through our website or social media accounts, post, facsimile or in person.

There may be some occasions, such as when we provide advocacy services to you, where we may collect information about you from third parties, such as your health care providers or other agencies. We will only collect personal information from such third parties where you provide your consent.

We may also collect your information when you have authorised someone to contact us on your behalf. For example, a family carer or guardian, or if another organisation or government agency is referring you to PWDA.

## **1.4 Our Website And Use Of Cookies**

We may also collect your personal information when you access our website through the use of “cookies” (which is a small summary file containing a unique ID number placed on your computer or device). This enables us to automatically recognise your computer and greet you each time you visit our website without bothering you with a request to register. We may collect the following information through cookies:

- your IP address (that is, the electronic addresses of computers connected to the internet);
- the date and time of your visit;
- the parts of our website you access during your visit;
- your actions on our website; and
- the browser you are using.

A cookie also enables us to keep track of products or services you view. We also use cookies to measure traffic patterns, to determine which areas of our website have been visited and to measure transaction patterns in the aggregate. We use this information to understand our users’ habits so that we can improve our online products and services.

We may log IP addresses to analyse trends, administer the website, track users’ movements, and gather broad demographic information.

When we embed content from third party websites like YouTube, cookies from those websites may also be placed on your device. Similarly, we use third-party services such as Google Analytics and WordPress. These vendors, including Google, may use cookies to track your visit to our website.

Most browsers are set by default to accept cookies. If you do not wish to accept cookies, you can set your browser so that your computer or device does not accept them. Please note that rejecting cookies may mean that some or all of the functions of our website will not be available to you.

## **1.5 What Happens If We Can't Collect Your Personal Information?**

If you do not provide us with the personal information described above, some or all of the following may happen:

- we may not be able to provide the requested products or services to you, either to the same standard or at all;
- we may not be able to provide you with information about products and services that you may want; or
- we may be unable to tailor the content of our websites to your preferences and your experience of our websites may not be as enjoyable or useful.

Where possible, we will allow you to interact with us anonymously or using a pseudonym. For example, if you contact us with a general enquiry, we will not require you to provide your name unless we need it to adequately handle your enquiry. However, for most of our functions and activities we usually require your name and contact information.

## **1.6 For What Purposes Do We Collect And Use Your Personal Information?**

We collect personal information about you so that we can perform our business activities and functions, including promoting disability rights, conducting disability advocacy and providing representation for people with disability, and to provide the best possible quality of customer service.

Personal information collected by us may be used for the following purposes:

- to provide products and services to you and to send communications requested by you, including in connection with providing you with advocacy and support services;
- to answer enquiries and provide information or advice about our products or services, or to respond to your questions or suggestions;
- to inform our policy recommendations, government submissions and research activities;
- to improve the quality of our products and services (including planning, product or service development);

- to assess the performance of the website and to improve the operation of the website;
- to conduct marketing activities, including to provide you with information and updates about our work, news and events including via our newsletter;
- to provide you with surveys;
- to conduct business processing functions and administrative activities;
- to update our records and keep your contact details up to date;
- to process and respond to any complaint made by you; and
- to comply with any law.

## 1.7 Direct Marketing Materials

We may send you direct marketing communications and information about our products and services and updates about our advocacy, news and upcoming events, including via our newsletter, that we consider may be of interest to you.

These communications may be sent in various forms, including mail, SMS and email.

At any time you may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications.

We do not provide your personal information to other organisations for the purposes of direct marketing.

## 1.8 To Whom May We Disclose Your Information?

We may disclose your personal information to:

- our staff members and related bodies corporate for our own business purposes;
- contractors or service providers for the purposes of conducting our core work activities and functions of promoting disability rights, conducting disability advocacy and providing representation for people with disability, operating our website or our business, fulfilling requests by you, and to otherwise provide products and services to you. Our third-party contractors or service providers may include for example IT systems providers and administrators, payment processors, and professional advisors.

Where information is shared with these third parties, we will take all reasonable steps to ensure that third parties observe the confidential nature of such

information and are prohibited from using any or all of this information beyond what is necessary to assist us. At this time, all third parties referred to above are located within Australia, however this may change in the future and if it does we will update this privacy policy accordingly;

- health professionals involved in services we provide you;
- Qantas, if you make an application for a Qantas Carer Concession Card through us;
- if you are receiving support through the NDIS or support from any government program we may disclose your information to those agencies if required by them; and
- specific organisations for authorised purposes where you have provided your express consent. This includes:
  - disclosures that we may make in connection with our advocacy support services such as lodging police or medical reports and victim impact statements; and
  - disclosures to third parties about our membership register.

In both cases we will only make these disclosures with your consent.

We may disclose de-identified information about our members' and clients' experience of our advocacy support services to the Department of Social Services. This information is collected through our SCORE survey and is collected because we are required to report to the Department of Social Services about our services to receive funding.

We may also disclose information about your life experiences or stories in connection with our advocacy activities. For example, if you tell us a story about your experience of the NDIS, we may use all or part of this information in a submission or report that we provide to government, or we may use it in other material or communications that we publish. We will seek your consent to use information from your stories or about your experiences on an identified basis, otherwise we will disclose this information on a de-identified basis.

We may also disclose your personal information as permitted or required by law.

Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

## 1.9 How Can You Access And Correct Your Personal Information?

You can ask to access any personal information we hold about you at any time by contacting us (see the details below). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you).

There may be some situations where we cannot let you access the personal information we hold. For example, if giving you the information would interfere with the privacy of other people or if it would be a breach of their confidentiality. If that happens, we will explain in writing why we had to refuse your request.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you can ask us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment then we will add a note to the personal information stating that you disagree with it.

We will not charge you a fee for simply making a request and will not charge you a fee for making any corrections to your personal information.

If you indicate a preference for a method of communication and we need to communicate with you, we will endeavour to use your preferred method of communication whenever practical to do so.

## 1.10 How Do We Hold Your Information?

We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure. We may hold your information in either electronic or hard copy form. The security measures we take include the use of technologies and processes such as access control procedures, network firewalls, encryption and physical security to protect the privacy of your personal information.

Personal information is destroyed or de-identified when no longer needed to fulfil the purposes we collected it for or for the purposes of satisfying any legal, accounting, or reporting obligations (including consistent with our record retention policies) we may have.

In some circumstances we may anonymise or de-identify your personal information (so that it can no longer reasonably identify you). We hold this anonymised or de-identified information for research or statistical purposes, and may use this information indefinitely, including in our case studies, submissions, annual reports, reports to our funding provider (the Department of Social Services) and other published reports, without further notice to you.



As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

## 1.11 Links

Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third-party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices. We recommend that you review the privacy policies of each website you visit.

## 1.12 Contacting Us And Making A Complaint

If you have any questions about this privacy policy, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please use the contact link on our website or contact our Governance and Compliance Coordinator using the details set out below.

We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in timely and appropriate manner.

Please contact our Governance and Compliance Coordinator at:

Governance and Compliance Coordinator

People with Disability Australia

Post: PO Box 666,  
Strawberry Hills NSW 2012  
Australia

Tel: 02 9370 3100

Toll Free: 1800 422 015

Email: [pwd@pwd.org.au](mailto:pwd@pwd.org.au)

If you are dissatisfied with our response, you have the right to make a complaint to the Office of the Australian Information Commissioner by phoning 1300 363 992 or by email at [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au).

## 1.13 Changes To Our Privacy Policy

We may change this privacy policy from time to time. We will post any updated versions of the privacy policy on our website.

This privacy policy was last updated in January 2022.

## Related documents

### Relevant, legislation, regulations and standards:

- UNCRPD
- Privacy Act 1988
- Corporations Act 2001
- National Disability Services Standards. Standard 1. Rights

### Related PWDA policy documents:

- About our Privacy Policy – Easy Read