

GOV-011 Privacy Policy

Authorised by: PWDA Board

Applies to: All PWDA Board Directors, employees, volunteers and contractors who handle personal information

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Privacy Statement

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**), including the Australian Privacy Principles. This Privacy Policy tells you how we handle your personal information.

An Easy Read version of our Privacy Policy is also available at:

<https://pwd.org.au/wp-content/uploads/2022/04/About-our-Privacy-Policy-Easy-Read-2022.pdf>.

Personal Information

We use the meaning of “personal information” that is in the Privacy Act. In general terms, “personal information” is any information or any opinion about you, or that a person could reasonably determine is about 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 also defined under the Privacy Act, and because it is sensitive, has additional protections that apply to how it must be treated. It includes things like your health information, political opinions, genetic information, ethnic origin, sexual orientation and criminal history. However, PWDA does not collect all these types of sensitive information.

Personal Information we collect and hold

We may collect and hold different types of personal information from you, which may vary depending on the way in which you interact with us, including:

- name
- mailing or street address
- email address
- telephone 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
- when you have engaged with us, details about what you have used, purchased or enquired about in engaging with us, including any of the products and services that we offer and any additional information necessary to deliver those products and services to you and to respond to your enquiries
- details you provide to us when you choose to respond to and participate in surveys and other consultation activities we may run 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.

In addition, we may collect and hold 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, participate in a program or project or volunteer with us, we may collect additional sensitive information about you, including your criminal history.

We may also collect and hold 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.

How we collect your Personal Information

We may collect personal information from you when you:

- visit our website

- 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 engage in member activities or 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 or in person, or otherwise as notified to you from time to time.

We will generally collect personal information directly from you. 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.

Where we collect information from a third party, we will determine whether we would have been entitled to collect such information from you and to the extent we would not have been entitled to do so, we will destroy or de-identify such information as soon as reasonably practicable.

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.

Our website and how we use cookies

We may also collect information when you access our website, including through “cookies”. Cookies are small summary files placed on your computer or device which enable us to automatically recognise your computer and greet you each time you visit our website. We may collect the following information through cookies:

- your IP address (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.

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 of the functions of our website will not be available to you.

Links to third-party websites

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.

What we collect, hold, use and disclose your Personal Information for

We collect, hold, use and disclose 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 held, used and disclosed for the following purposes:

- to provide products and services to you and to send communications requested by you, including in connection with your membership and 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.

What if we can't collect your Personal Information

If you do not provide us with the personal information described above, we may not be able to:

- provide the requested products or services to you, either to the same standard or at all
- provide you with information about products and services that you may want; or

- tailor the content of our websites and communications to your preferences and your experience of our websites and communications 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.

Direct marketing materials

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

These communications may be sent in various forms, including mail, SMS (text messages) and email.

You may opt out of receiving marketing information by notifying us accordingly, or by using any unsubscribe facility we provide for that purpose.

While we may market to you as described above, we will always do so ourselves (or using our own third party contractors). We do not provide your personal information to other organisations for the purposes of their direct marketing.

Who we disclose your Personal Information to

We may disclose your personal information to:

- our staff members and related bodies corporate for our own business purposes
- 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 also disclose your personal information to our third party contractors or service providers who help us conduct 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 third parties, we will take all reasonable steps to ensure that they 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.

We may disclose de-identified information about our members' and clients' experience of our advocacy support services to the Department of Social Services or other funding agencies. This information is disclosed 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 sold, rented or traded to third parties.

How to access and correct your Personal Information

You can ask to access any personal information we hold about you at any time by contacting us using the details set out 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. We may also withhold access for reasons permitted by law. If that happens, we will explain in writing why we had to refuse your request.

If you believe the personal information we hold about you is incorrect, incomplete or inaccurate, please contact us and we will take reasonable steps to either correct the information, or 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.

For most requests, your information will be provided free of charge, however, we may charge a reasonable fee if your request requires a substantial effort on our part.

Protecting your Personal 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 we may have (including consistent with our record retention policies)

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 providers 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.

Data breaches

A data breach happens when personal information that is held by PWDA has been lost or accessed or disclosed without authorisation. Such as when:

- a device is lost or stolen
- a database is hacked
- personal information is mistakenly given to the wrong person.

If we suspect a data breach, we will:

- analyse if an incident has or is occurring
- assess the scope, impact and severity of the incident
- implement a resolution plan
- identify and notify affected stakeholders
- confirm when the incident has been resolved.

We will also notify the Office of the Australian Information Commissioner (OAIC) if a data breach involving personal information is likely to result in serious harm to one or more individuals or we have not been able to prevent the likely risk of serious harm with remedial action.

How to contact us and how to make a complaint

If you have any questions about this privacy policy, any concerns or wish to make a complaint regarding the treatment of your privacy or a possible breach of your privacy or the Australian Privacy Principles, please use the [contact us form](#) on our website or write, phone or email our Manager Governance and Compliance, People with Disability Australia:

Post: PO Box 666,
Strawberry Hills NSW 2012
Australia

Phone: 1800 422 015

Email: feedback@pwd.org.au

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 a timely and appropriate manner.

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.

If you are dissatisfied with our response, you have the right to make a complaint to the Office of the Australian Information Commissioner (OAIC) by phoning 1300 363 992 or by emailing enquiries@oaic.gov.au. Please first submit your complaint to PWDA prior to submitting a complaint with the OAIC, as instructed on [the OAIC's website](#).

Changes To Our Privacy Policy

We may change this policy from time to time as legislation is updated or amended or if our processes change. We will post any updated versions of the Privacy Policy on our website.

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