



inc. OSTEOPOROSIS QUEENSLAND

ARTHRITIS & OSTEOPOROSIS QUEENSLAND (ARTHRITIS QUEENSLAND)

PRIVACY POLICY

1. INTRODUCTION

- 1.1 In the course of the work of Arthritis & Osteoporosis Queensland, there are circumstances where we collect personal information. This privacy policy has been developed to ensure that such information is handled appropriately.
- 1.2 We are committed to complying with the *Privacy Act 1988* (Cth) (**Privacy Act**) in relation to all personal information we collect. Our commitment is demonstrated in this policy. The Privacy Act incorporates the Australian Privacy Principles (**APPs**). The APPs set out the way in which personal information must be treated.

Who does the privacy policy apply to?

- 1.3 This policy applies to any person for whom we currently hold, or may in the future collect, personal information.

What information does the privacy policy apply to?

- 1.4 This policy applies to personal information. In broad terms, 'personal information' is information or opinions relating to a particular individual who can be identified.
- 1.5 Information is not personal information where the information cannot be linked to an identifiable individual.

2. HOW DO WE MANAGE THE PERSONAL INFORMATION WE COLLECT?

- 2.1 We manage the personal information we collect in numerous ways, such as by:
- (a) implementing procedures for identifying and managing privacy risks;
 - (b) implementing security systems for protecting personal information from misuse, interference and loss from unauthorised access, modification or disclosure;
 - (c) providing staff with training on privacy issues;
 - (d) appropriately supervising staff who regularly handle personal information;
 - (e) implementing procedures for identifying and reporting privacy breaches and for receiving and responding to complaints;
 - (f) reviewing database entries and archiving where appropriate;

- (g) appointing a privacy officer within the business to monitor privacy compliance; and
 - (h) allowing individuals the option of not identifying themselves, or using a pseudonym, when dealing with us in particular circumstances.
- 2.2 We will take reasonable steps to destroy or permanently de-identify personal information if that information is no longer needed for the purposes for which we are authorised to use it.
- 2.3 In most circumstances, it will be possible for you to use a pseudonym or remain anonymous when dealing with us. If you wish to use a pseudonym or remain anonymous you should notify us when making first enquiries with us. If you choose to use a pseudonym or to remain anonymous, we may not be able to provide our full range of services to you including providing tax receipts for donations or accepting you as an Arthritis Queensland member.

3. WHAT KINDS OF INFORMATION DO WE COLLECT AND HOLD?

Personal information

- 3.1 We may collect and hold personal information about you, which may include:
- (a) sensitive information (see below);
 - (b) contact information;
 - (c) financial information;
 - (d) banking details; and
 - (e) any other personal information required to provide the education, information or support services for you.

Sensitive information

- 3.2 'Sensitive information' is a subset of personal information and includes personal information that may have serious ramifications for the individual concerned if used inappropriately.
- 3.3 Generally, the only sensitive information we collect and hold is health information. However, in limited circumstances we may also collect and hold information relating to racial or ethnic origin or genetic information.
- 3.4 We will not collect sensitive information without the individual's consent to whom the information relates unless permitted under the Privacy Act.

4. HOW AND WHEN DO WE COLLECT PERSONAL INFORMATION?

- 4.1 Our usual approach to collecting personal information is to collect it directly from you.
- 4.2 We collect personal information in other ways, which might include:
- (a) from marketing and mailing lists;
 - (b) through "cookies" on our website which enable us to monitor traffic patterns and to serve you more efficiently if you revisit the site;
 - (c) through list purchases and from third party organisation such as other charitable and fundraising entities and data cooperatives;
 - (d) through referrals from individuals or other entities; and

- (e) through fundraising events.

5. HOW DO WE HOLD PERSONAL INFORMATION?

5.1 Our usual approach to holding personal information includes:

- (a) physically, at our premises; and
- (b) electronically:
 - (i) on secure servers;
 - (ii) on a private cloud; and
 - (iii) by a third party data storage provider.

5.2 We secure the personal information we hold in numerous ways, including:

- (a) using unique access codes to access areas that contain personal information after hours;
- (b) requiring volunteers to sign in when entering our premises;
- (c) using secure servers to store personal information;
- (d) using unique usernames, passwords and other protections on systems that can access personal information;
- (e) de-identifying documents and using confidential disposal systems; and
- (f) holding certain sensitive documents securely.

6. WHY DO WE COLLECT, HOLD, USE OR DISCLOSE PERSONAL INFORMATION?

6.1 We take reasonable steps to use and disclose personal information for the purpose for which we collect it. The purpose for which information is collected varies, but is generally to provide education, information, or support services to individuals. For example, this might include:

- (a) provision of information and support to our consumers;
- (b) processing donations, memberships, and other payments and issuing receipts;
- (c) communications (e.g. email, printed letters);
- (d) fundraising activities to achieve our mission and vision;
- (e) seeking ongoing support for research, services and programs provided by or on behalf of Arthritis Queensland;
- (f) surveying attitudes and opinions of people who have accessed our services or formed a professional relationship with us; and
- (g) keeping up-to-date lists of suppliers.

6.2 In the case of potential employees, the purpose the information is collected is to assess the individual's suitability for employment.

6.3 Personal information may also be used or disclosed by us for other purposes which are within your reasonable expectations and which are related to the primary purpose of collection.

6.4 Examples of organisations and/or parties that your personal information may be provided to where appropriate given the goods or services that we are providing to you, and where we have your consent to do so, include:

- (a) other service providers in order to provide the service for you, or to assist our functions or activities (such as printing service providers, accountants or law firms);
- (b) charitable or likeminded organisations, including fundraising organisation, grant and award providers which are aligned with Arthritis Queensland, and third party service providers who facilitate the sharing of information between such types of charitable or likeminded organisations (sometimes known as data cooperatives);
- (c) our third party technology providers such as our data storage providers.

6.5 Otherwise, we will only disclose personal information to third parties if permitted by the Privacy Act.

7. DIRECT MARKETING

7.1 Who are Supporters and what are Direct Marketing Communications?

For the purpose of this clause:

- (a) a “Supporter” is an individual or organisation who has donated or participated in fund raising and other activities in support of Arthritis Queensland,
- (b) “Direct Marketing Communication” is any communications about products, services, events, fundraising or any other activity (including third party products, services, events and fundraising) which may be of interest to you.

7.2 Consent by Supporters

Where you are a Supporter:

- (a) You expressly consent to us using your personal information; including any email address you give to us, to send you Direct Marketing Communications.
- (b) You expressly consent to us disclosing your personal information to other Arthritis Australia affiliates who may also use your personal information for sending you Direct Marketing Communications. We will take reasonable steps to ensure that your information is used by other Arthritis Australia affiliates in accordance with the terms of the Privacy Act.
- (c) You expressly consent to us disclosing your personal information to other likeminded organisations (including other charities, and third party service providers who facilitate the sharing of information between such types of charitable or likeminded organisations) who may also use your personal information to send you Direct Marketing Communications. We will take reasonable steps to ensure that your information is used by such organisations in accordance with the terms of the Privacy Act.
- (d) If at any time you do not wish us to disclose your personal information to others under paragraphs 7.2 (b) or (c) or you do not wish to receive any further marketing information from us, then you can simply request to opt out of receiving further Direct Marketing Communications from us and/or ask that we not to disclose your information to other organisations for that purpose. In the case of paragraph 7.2(c) we will give you an opportunity to opt out not less than 30 days before we disclose your personal information to such organisations. You may do this by contacting us by email at info@arthritis.org.au, by calling our toll free number 1800 011 041 or by writing to us at Privacy Officer, Arthritis Queensland, PO Box 2121, Windsor, Qld, 4030.

7.3 Read more: <http://www.arthritis.org.au/about-us/privacy-and-disclaimer-policy/>

8. WILL WE DISCLOSE PERSONAL INFORMATION OUTSIDE AUSTRALIA?

Personal information is collected to process donations, issue tax receipts and to send you updates. For these purposes, your information may be shared with trusted third parties and our service providers (and their directors, servants and agents), either in Australia or overseas.

Occasionally we allow like-minded organisations to contact you with information that may be of interest to you, including some organisations located outside Australia. Those organisations allow us to do the same and this way we can reach more people with vital information.

9. HOW DO YOU MAKE COMPLAINTS AND ACCESS AND CORRECT YOUR PERSONAL INFORMATION?

- 9.1 It is important that the information we hold about you is up-to-date. You should contact us if your personal information changes.

Access to information and correcting personal information

- 9.1 You may request access to the personal information held by us or ask us for your personal information to be corrected by using the contact details in this section.
- 9.2 Subject to section 9.4, we will grant you access to your personal information as soon as possible.
- 9.3 In keeping with our commitment to protect the privacy of personal information, we may not disclose personal information to you without proof of identity.
- 9.4 We may deny access to personal information if:
- (a) the request is unreasonable;
 - (b) providing access would have an unreasonable impact on the privacy of another person;
 - (c) providing access would pose a serious and imminent threat to the life or health of any person; or
 - (d) there are other legal grounds to deny the request.
- 9.5 We will not charge a fee for changing or removing personal information.
- 9.6 If the personal information we hold is not accurate, complete and up-to-date, we will take reasonable steps to correct it so that it is accurate, complete and up-to-date, where it is appropriate to do so.

Complaints

- 9.7 If you wish to complain about an interference with your privacy, you must follow the following process:
- (a) The complaint must be firstly made to us in writing, using the contact details in this section. We will have a reasonable time to respond to the complaint.
 - (b) In the unlikely event the privacy issue cannot be resolved, you may take your complaint to the Office of the Australian Information Commissioner.

Who to contact

- 9.8 A person may make a complaint or request to access or correct personal information about them held by us. Such a request must be made in writing to the following:

Privacy Officer: Deborah Melloy

Postal Address: PO Box 2121 Windsor QLD 4030

Telephone number: (07) 3857 4200

Email address: deborah@arthritis.org.au

10. CHANGES TO THE POLICY

- 10.1 We may update, modify or remove this policy at any time without prior notice. Any changes to the privacy policy will be published on our website.
- 10.2 This policy was last reviewed in August 2016. If you have any comments on the policy, please contact the privacy officer with the contact details in section 9 of this policy.