

Privacy Policy

1. Policy Statement

Uniting (Victoria and Tasmania) Limited (**Uniting**) recognise the importance of protecting your privacy and your rights in relation to your personal information. This Policy outlines the types of personal information that we usually collect, the purposes for which we collect it, to whom we disclose it, how we hold and keep it secure, and your rights in relation to your personal information, including how to complain and how we deal with complaints.

We will handle your personal information in accordance with this Policy and applicable law, including the *Privacy Act 1988* (Cth) and applicable state-based privacy and health records legislation.

We may update this Privacy Policy from time to time by publishing changes to it on our website.

2. Scope

This policy applies to all people engaged by Uniting, across the activities, programs and services delivered in Victoria and Tasmania.

This Policy does not apply to:

- the personal information of our employees*; or
- the handling of personal information by our related entities.

*Employee files are exempt from the privacy laws for information that is directly related to the employment relationship. However, Uniting follows the APPs when providing information about its employees to third parties, noting that this approach is considered best practice for employers. Uniting is required under the *Fair Work Act 2009* (Cth) to provide employee information to a Fair Work Inspector and some government agencies have powers to request information from employers.

3. Policy

3.1 What is your personal information?

In this Policy, **personal information** means any information or opinion about an identified individual or an individual who is reasonably identifiable, whether true or not. In general terms, personal information is any information that can be used to personally identify you, either on its own (e.g., your name) or when combined with other information reasonably available to us (e.g., we cannot identify you from your date of birth alone, however, as we can link this to your name in our databases, it is your personal information).

3.2 What is sensitive information?

Some of the personal information we may need to collect about you may include **sensitive information**, which is a special category of personal information that is given extra protection under privacy laws. Sensitive information includes information about your health, racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal history, genetic information, biometric templates, and biometric information (e.g., features of your face). Sensitive information can include photographs or videos where a person's identity is clear or can reasonably be worked out from the photo/video.

3.3 What personal information do we collect and hold?

Uniting only collects information that is relevant, reasonable, and lawful for our purposes or functions. The types of personal information we collect and hold about you depends on the dealings you have with us. This generally includes your full name and contact details (street address, email address and phone number) and may include other types of information listed in Appendix 1. Wherever reasonable and appropriate we will ask for your consent to collect personal information about you.

3.4 How do we collect your personal information?

We may collect personal information from or about you in different ways, including:

- through your access and use of our website;
- during conversations and via correspondence between you and our representatives;
- from your carer or authorised representative;
- at point of engagement with, or as part of access processes for, services or programs;
- when you complete an application or purchase order;
- when you register for our conferences, events, or courses and when you participate in our activities;
- from your employer or educational institution;
- when you complete our forms for the provision of services;
- when you complete a survey or make a donation;
- from your referees and recruiters;
- from our service providers;
- from other charities (if the other charity has obtained your consent to disclose your personal information to us); and
- through CCTV surveillance at our premises.

3.5 Can you remain anonymous?

Where practicable and lawful, you may interact with us without identifying yourself (including by using a pseudonym). For example, if you contact us with a general question we will not record your name unless we need it to adequately handle your question. In addition, you can visit our website without providing any personal information.

If you choose not to identify yourself, we may be limited in our ability to respond to your query or provide you with the services or assistance you require.

When you visit our website, we may also use 'cookies' or other similar tracking technologies that help us track your website usage and remember your preferences. Cookies are small files that store information on your computer, mobile phone, or other device. They enable us to recognise you or your device(s) across different websites, services and/or browsing sessions, for example, so that we can greet you each time you visit our website without bothering you with a request to register. You can disable cookies through your internet browser but our website may not work as intended for you if you do so.

Whilst we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and date of your visit, search engine referrals, and the internet protocol address assigned to your computer.

3.6 For what purposes do we collect, hold, use, and disclose your personal information?

We collect, hold, use, and disclose your personal information for the following purposes:

- providing services to you and sending communications requested by you;
- conducting service processing functions, which may include providing personal information to our various organisations, contractors, service providers or other third parties and establishing and maintaining your involvement with us;
- facilitating and managing your purchase from, or donation of goods to, one of our stores;
- answering enquiries and providing information or advice, including about existing and new services;
- processing and responding to any complaint made by you;
- accessing the performance of our website, tracking use of any services we offer and improving the operation of our website;
- updating your personal information held by us, our related bodies, contractors, or service providers and keeping your contact details up to date;
- processing your job, volunteer or contract position application and managing your volunteer or contract placement with us;
- registering you for events, conferences, courses and activities;
- direct promotion of services and keeping you informed of new developments we believe may be of interest to you or conducting fundraising campaigns;
- dealing with third parties where we have retained those third parties to assist us to undertake our activities and provide the services you have requested, such as catering and event coordinators, promotions companies, transport providers, health care providers, website hosts and IT consultants, and our professional advisers such as consultants, lawyers and accountants;
- dealing with different parts of our organisation to enable the development and promotion of other community-based activities and services;
- safeguarding users of our services and programs;

- complying with any law, rule, regulation, lawful and binding determination, decision, or direction of a regulator, or in co-operation with any governmental authority of any country.

3.7 To whom do we disclose your personal information?

We may disclose your personal information to the following:

- various like-minded and trusted organisations, contractors or service providers for the purposes of our operations or operation of our website, fulfilling requests by you, and to otherwise provide services to you (e.g., mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants);
- suppliers and other third parties with whom we have commercial relationships, for operations, marketing, and related purposes;
- where relevant our support agencies in order to provide you with assistance;
- other entities authorised at law to share information such as for the purposes of assessing or managing the risk of family violence; and
- otherwise with your consent.

3.8 Do we disclose your personal information overseas?

Some of the organisations to whom we disclose your personal information (see **Section 3.7** of this Policy) may be located overseas.

In general, we will not disclose personal information overseas unless we take reasonable steps to ensure the recipient will protect your personal information and handle it in accordance with the Australian Privacy Principles. This may include entering into contractual arrangements with the recipient or ensuring they are already subject to laws that are equivalent to the Australian Privacy Principles that you can enforce.

3.9 How do we use your personal information for marketing, fundraising and advocacy communications?

We may, with consent where required, use your personal information to identify a product or service that you may be interested in and to contact you from time to time (whether by email, SMS or mail) to tell you about products, services, news, deals and special offers that we believe may be of interest to you.

You can opt-out of receiving direct marketing communications from us at any time by selecting the opt-out option in our marketing communications or by contacting our Privacy Officer using the contact information in **Section 3.14** of this Policy.

3.10 How do we use personal information from donors and supporters?

We may share personal information we receive from donors and supporters to collaborate with other like-minded and trusted organisations and reach more people in the community. We may share information with third parties such as:

- contractors or external agencies that we engage for services (e.g., mailing houses or technology service providers)
- regulatory bodies, government agencies or law enforcement bodies.
- other charities so that they may contact you about their initiatives.

You can opt-out of receiving direct marketing communications from us at any time by using the opt-out facility in our marketing communications by contacting our Privacy Officer using the contact information in **Section 3.14** of this Policy.

3.11 How do we hold your personal information and keep it secure?

We store your personal information in hard copy and/or electronically. Electronic information is stored with a third-party storage provider. We take reasonable steps to protect your personal information from misuse, interference, and loss, and from unauthorised access, modification, or disclosure.

We only keep your personal information for as long as it is required for a purpose for which the information may be used or disclosed under the *Privacy Act 1988* (Cth) or as otherwise required by applicable law or authority. If we no longer need to hold your personal information for any reason and are no longer required by law to keep it, we will take reasonable steps to de-identify or destroy that information. These steps may vary depending on the nature of the information, the way it was collected, and how it is stored.

3.12 How can you access and correct your personal information?

Correction requests

You may request to correct your personal information at any time by contacting our Privacy Officer using the contact information in Section **3.14** of this Policy. We may need to verify your identity before responding to your request. Subject to any applicable exceptions, we will take reasonable steps to correct your personal information within a reasonable time. If we decide to refuse your request, in most circumstances we will tell you why in writing and how to complain.

We will not charge you to correct your personal information.

Access requests

You may request access to your personal information at any time by completing our [Privacy - Request to access personal information Form](#), which is available at and returning it to our Privacy Officer using the contact information set out in the form. We may need to verify your identity before responding to your request. Subject to any applicable exceptions or requirements, we will provide you with access to the personal information you request within a reasonable time. If we decide to refuse your request, in most circumstances we will tell you why in writing and how to complain.

We may charge you a fee to cover our reasonable administrative and other costs (such as photocopying or time spent on redaction) in providing the information to you. If we estimate those fees to be greater than \$100, we will provide you with an estimate of fees and seek your agreement to those fees prior to commencing work on providing the information.

For further information about how to access your personal information, including circumstances when we may not provide you access to your information in whole or in part, please see our **Privacy - Request to access personal information Form**.

3.13 How can you make a privacy complaint?

If you consider that we have breached your privacy, or you are not happy with the way we have handled your personal information, please contact our Privacy Officer using the contact information in Section **3.14** of this Policy.

We will respond to you within a reasonable period of time to acknowledge your complaint and inform you of the next steps we will take in dealing with your complaint.

If you are not satisfied with our response, you may complain to the Office of the Australian Information Commissioner (**OAIC**) via the OAIC website, www.oaic.gov.au. If there are other government agencies we consider you can complain to, based on the nature of your complaint, we will inform you of this at the time we respond to your complaint.

3.14 How can you contact us?

If you have a question or comment regarding this Policy or wish to make a complaint or exercise your privacy rights, please contact our Privacy Officer:

Privacy Officer
Uniting (Victoria and Tasmania) Limited
Level 4, 130 Lonsdale Street, Melbourne Vic 3000
Tel: (03) 9192 8100 Email: privacyofficer@vt.uniting.org

4. Legislation/Regulations

Privacy Act 1988 (Cth) and the Australian Privacy Principles (*Privacy Act 1988, Schedule 1*) (the APPs)

Privacy and Data Protection Act 2014 (Vic) and the Information Privacy Principles (the IPPs)

Health Records Act 2001 (Vic) and Health Privacy Principles (the HPPs)

Fair Work Act 2009 (Cth)

Child Wellbeing and Safety Act 2005 (Vic)

Children, Youth and Families Act 2005 (Vic)

Family Violence Protection Act 2008 (Vic)

Notifiable Data Breaches Scheme 2017

Family Violence Information Sharing Scheme 2017

Child Information Sharing Scheme 2017

Domestic and Family Violence Act 2007 (NT)

Australian Information Commissioner Act 2010 (Cth)

Archives Act 1983 (Cth)

Charter of Human Rights and Responsibilities Act 2006 (Vic)

Competition and Consumer Act 2010 (Cth)

Commissioner for Children and Young People Act 2016 (Tas)

Enhancing Online Safety Act 2015 (Cth)

Freedom of Information Act 1982 (Cth)

Freedom of Information Act 1980 (Vic)

Health Records and Information Privacy Act 2002 (NSW)

Human Rights Act 2019 (Qld)

Information Privacy Act 2009 (Qld)

Mental Health and Wellbeing Act 2022(Vic)

Right to Information Act 2009 (Tasmania)

Personal Information Protection Act 2004 (Tas)

Privacy Amendment (Enhancing Privacy Protection) Act 2012

Privacy Amendment (Notifiable Data Breaches) Act 2017

Children Legislation Amendment (Information Sharing) Act 2018 No.11 (Vic) which outlines exceptions to the collection of information requirements contained in the Health Records Act 2001 (Vic) and the *Privacy and Data Protection Act 2014 (Vic)*

Family Violence Protection (Information Sharing) Amendment Act 2017 No.23 (Vic) and *Family Violence Protection (Information Sharing) Regulations 2018 No.14 (Vic)* which amends a range of legislation in regard to information sharing for family violence assessment and protection purposes.

Social Security (Administration) Act 1999

Appendix 1: Types of information we collect and hold

Consumers and program participants, and their carers

- age and/or date of birth, profession, occupation or job title, identity documents, emergency contact details;
- bank account details;
- information regarding your health, including disability type (if any);
- religious affiliation, ethnicity, family history, background, income status;
- details of the services that we have provided to you or which you have enquired about, together with any additional information necessary to respond to your enquiries or to deliver those services, including a record of your consent
- any additional information relating to you that you provide to us directly through our websites or indirectly through use of our websites, activities, services, surveys, visits, or online presence, through our representatives or otherwise;
- other sensitive information about you where it is reasonably necessary for one or more of our functions or activities.

Donors and supporters:

- employer details if you participate in workplace giving;
- bank account or credit card details;
- age and/or birth date, gender, income, profession, occupation or job title, your interests and opinions;
- details of the services which you have enquired about, together with any additional information necessary to respond to your enquiries;
- any additional information relating to you that you provide to us directly through our websites or indirectly through use of our activities, services, surveys, visits, websites, or online presence, through our representatives or otherwise.

Customers (including customers of our stores, opportunity shops and hospitality enterprises):

- information relating to your purchase;
- personal information collected for loyalty programs.

Contractors:

- employer;
- bank account details;
- working with children check and criminal history check;
- trade licences and certificates.

Job applicants, volunteers, and students on placement:

- profession and/or job title, employment history and qualifications, academic records, references;
- information about your placement;
- sensitive information about you (including health information) where it is reasonably necessary for one or more of our functions or activities.

- age and/or date of birth;
- for volunteers who receive reimbursements or payments, bank account and taxation details;
- criminal history check, working with children check; and,

Individuals who visit one of our premises:

- footage of you collected via CCTV surveillance