

# **PRIVACY POLICY**

Drafted by Responsible person Distributed externally

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23.10.23 23.10.24

## INTRODUCTION

SA Police Legacy Inc. is committed to complying with the Australian Privacy Principles contained in the Privacy Act 1988. We recognise the importance of privacy, and community awareness regarding the collection, use, disclosure and security of personal information, including any sensitive information, which we may collect during the course of providing our services and conducting fundraising.

## PURPOSE

This policy explains how we collect, manage and use personal information and protect the privacy of those who interact with us.

### POLICY

### Collection and use of personal information

'Personal information' is information or opinion about an identified individual, or an individual who is reasonably identifiable:

- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not.

The collection of personal information by us is usually necessary to provide a product or service, or to manage and maintain our relationship with those who engage with us.

The kinds of personal information we collect and keep may include:

- your name, address, phone number, email address and/or date of birth
- your family details including marital status, children, next of kin, and details about a deceased spouse/partner
- your financial details
- a history of your interactions with us, our staff and volunteers,

and may sometimes include sensitive information, such as information about your health or your criminal record.

We may collect personal information when you:

- become
  - o a member of the association
  - o a recipient of one of our services
  - o a job applicant, volunteer or employee
  - o a donor or customer
- apply for a financial grant.

We may collect sensitive information when you:

- apply for a member health grant or young legatee wellbeing grant
- apply to volunteer or work with the association.

The purposes for which we collect and use personal information include:

- complying with legislative and regulatory requirements
- considering any application you make to us, including assessing your eligibility for any services
- performing our administrative operations, including accounting, risk management, record keeping, archiving, systems development and testing, and human resources recruitment and training
- delivering and evaluating our services
- sending newsletters and other information about the association
- processing donations and/or purchases
- managing our rights and obligations in relation to external payment systems; and
- promoting our products and services
- offering fundraising/donation opportunities
- notifying next of kin in an emergency situation.

We have obligations to only collect personal information if it is reasonably necessary for our functions or activities and to take reasonable steps to ensure any personal information we collect is accurate and up to date. We will only collect sensitive information if you consent to us doing so.

#### Use and disclosure of personal information

We will not use your personal information, or disclose it to a third party, except for a purpose set out in this policy, a purpose that is related to one of those purposes and that you'd reasonably expect, or a purpose that is required or permitted by law.

We may disclose your personal information to third parties who assist us with our activities, such as contractors and external service providers, but they will also have obligations to preserve the confidentiality of the information. We are not likely to disclose any personal information to overseas recipients.

#### Access to personal information

You have the right to request access to, and request correction of, the personal information we hold about you, subject to some exceptions detailed in the Australian Privacy Principles. Requests for access to personal information should be directed to the Manager, SA Police Legacy. Proof of identity will be required.

#### Security of personal Information

We maintain strict procedures and standards and take all reasonable care to prevent unauthorised access to, and modification and disclosure of, personal information. We take reasonable steps to protect personal information from misuse and loss. Personal information is held on a database that requires password access and has restricted users, however, no data transmission over the internet

can be guaranteed as fully secure and accordingly we cannot guarantee or warrant the security of any information you send to us via the internet. You submit information over the internet at your own risk. If we no longer need your information, we will destroy or de-identify it as per our data management policy which you can access by contacting us.

In the event of a data breach, we will respond quickly and take all steps required to ensure appropriate management and containment of the breach. You will be notified if your personal information is lost or subjected to unauthorised access.

#### **Direct marketing**

SA Police Legacy does not engage in cold calling or telemarketing. Personal information will not be used for the purposes of direct marketing except where you have provided information that you would reasonably expect us to use for that purpose. If you are called by anyone claiming to be an employee of SA Police Legacy, you should contact us as soon as possible.

#### Complaints about breaches of privacy

Complaints about breaches of privacy should be directed to the Manager, SA Police Legacy. Every effort will be made to resolve complaints internally according to our Complaints Policy. If a satisfactory resolution is not achieved, an application may be made to the Office of the Australian Information Commissioner to have the complaint investigated.

#### Changes to this privacy policy

This policy is current and replaces any of our other privacy policies to date. Our privacy policy may change from time to time and without notice. We encourage periodic reviews of our privacy policy for any changes.

#### Website privacy

This privacy policy applies to any website operated by us.

Personal information about visitors to our website is collected only when it is knowingly and voluntarily submitted. For example, we may need to collect such information to provide services or to answer or forward any requests or enquiries. Copies of correspondence sent from the website that may contain personal information are stored as archives for record-keeping and back-up purposes only.

We ensure that payment card information is kept confidential and secure, and that we comply with the Payment Card Industry Data Security Standard.

Our website may contain links to third party websites and these websites are not subject to our privacy standards. Third parties are responsible for informing you of their own privacy policies. We do not have any arrangements in place whereby personal information is collected by third parties using links on our website.

We strive to ensure the security, integrity and privacy of personal information submitted to our website, and we regularly review and update our security measures. We will take all reasonable steps to protect any personal information transmitted online. Unfortunately, no data transmission over the internet can be guaranteed to be totally secure, and there are inherent risks users should be aware of.

#### **Related policies**

Confidentiality policy Information, Communication and Technology policy Data Retention policy