

# Privacy Policy

## 1. Our commitment to protecting your privacy.

- 1.1. Uniting (Victoria and Tasmania) Limited (“we”, “us”, “our”) recognise the importance of protecting the privacy and the rights of individuals in relation to their personal information. Our values of ‘respect’ and ‘compassion’ underpin our work with consumers and stakeholders and the handling of the information they give us.
- 1.2. This document is our privacy policy and it tells you how we collect and manage your personal information, including information collected from our website, through our representatives or otherwise, as part of the carrying out of operations, activities and the provision of services. Our privacy policy will be made available via multiple channels, including on our website. The privacy policy has been written for Uniting’s stakeholders, with relevant sections tailored to suit four key audience groups (sections 3 to 6), each with a supporting privacy statement:
  - 1.2.1. Service Users: consumers (including clients and their carers).
  - 1.2.2. Donors and Supporters: individuals and organisations that support the work of Uniting through financial and in-kind support.
  - 1.2.3. Customers: individuals who purchase from Uniting, including opportunity shops and hospitality enterprises.
  - 1.2.4. Volunteers: individuals who donate time willingly for the common good and without financial gain.
- 1.3. We respect your rights to privacy under the *Privacy Act 1988 (Cth)*, *Privacy Data and Protection Act 2014 (Vic)*, *Health Records Act 2001 (Vic)* and *Personal Information Protection Act 2004 (Tas)* (“the privacy laws”) and we are committed to the requirements in respect of the collection, management and disclosure of your personal information under the privacy laws.
- 1.4. Employee files are exempt from the privacy laws for information that is directly related to the employment relationship however Uniting follows the Australian Privacy Principles (APP) 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 to provide employee information to a Fair Work Inspector and some government agencies have powers to request information from employers.

## 2. What is your personal information?

- 2.1. When used in this privacy policy, the term “personal information” has the meaning given to it in the *Privacy Act 1988 (Cth)*. In general terms, it is any information that can be used to personally identify you. This may include your name, address, telephone number, email address and profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

- 2.2. Additionally, some of the personal information we may need to collect from you may include “sensitive information”, such as information about your health, racial or ethnic origin, political opinions, association memberships, religious affiliation, sexual orientation, criminal history, genetic or biometric information.

### **3. Service Users**

#### **3.1. What personal information do we collect and hold?**

- 3.1.1. We will only collect personal and sensitive information that is necessary for us to carry out services and programs. The type of information we may collect, hold and use, varies depending on the purpose for which it is collected.
- 3.1.2. We may collect the following types of personal information:
- name;
  - mailing and/or street address;
  - email address;
  - telephone number;
  - facsimile number;
  - age or birth date;
  - profession, occupation or job title;
  - details of the services that we have provided to you or which you have enquired about, together with any additional information necessary to deliver those services and 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 websites or online presence, through our representatives or otherwise;
  - information you provide to us through our activities and services, surveys or visits by our representatives from time to time;
  - bank account details.
- 3.1.3. We may also collect some information 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.
- 3.1.4. We may also collect sensitive information about you (including health information) where it is reasonably necessary for one or more of our functions or activities.
- 3.1.5. For our consumers, i.e. service recipients, program participants or clients of our other services (as a recipient or participant) in one of our many services and programs (such as aged care, employment assistance, emergency relief, social or other services and programs), we may need to collect your name and contact details, information regarding your health, income status, religious affiliation, ethnicity, disability type (if any); family history, background and emergency contact details.

#### **3.2. How do we collect personal information?**

- 3.2.1. We collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect it in a variety of ways including:

- through your access and use of our website;
  - during conversations and via correspondence between you and our representatives;
  - 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;
  - when you complete our forms for the provision of services;
  - when you complete a survey or make a donation.
- 3.2.2. We will take active measures to ensure the security of the personal information that we collect and hold, and will protect that information from misuse, interference and loss, and from unauthorised access, modification or disclosure.
- 3.2.3. We may also collect personal information from third parties including from entities, where this is something you ask us to do, assists us in delivering quality services and/or is in the best interests of service users.
- 3.2.4. When we collect personal information, we take reasonable steps to ensure that you are aware of certain matters relating to the collection of personal information, for example by providing a 'collection statement' at the time your personal information is collected. We may also require you to provide consent at the point of collection, if consent is required under the Privacy Act or other applicable laws.
- 3.2.5. When you provide us with personal information on behalf of other individuals, unless it is a protected disclosure, we rely upon you to:
- make them aware of this policy and any relevant collection statement;
  - make them aware that you have provided us with that information; and
  - obtain their consent or ensure that you are otherwise authorised to provide us with that information.
- 3.3. **Anonymity**
- 3.3.1. Where it is not required for programs and services, we will provide individuals with the option of not identifying themselves when contacting us, participating in activities or obtaining assistance from us. In such circumstances we will only obtain as much personal information as is necessary to provide you with the service or assistance you require.
- 3.4. **Our website**
- 3.4.1. In some cases, we may also collect your personal information through the use of 'cookies'. When you access our website, we may send a cookie (which is a small summary text file containing a unique ID number) to your computer. This enables us to recognise your computer and greet you each time you visit our website without bothering you with a request to register. It also enables us to keep track of services and products you view so that, if you consent, we can send you news about those services and products. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them.

- 3.4.2. We also use third party vendors, including Google, to help manage our online advertising on other websites. To opt out of our third-party vendor's use of cookies please visit the Network Advertising Initiative opt out page<sup>1</sup> To opt out of Google's use of cookies, please visit the Google Opt Out page<sup>2</sup>.
- 3.4.3. In some cases, we may use Google Analytics or log IP addresses for research or security purposes, but this does not involve the collection of personal information. The logging of IP addresses is not used for identifying users.
- 3.5. **What happens if we can't collect your personal information?**
- 3.5.1. If you do not provide us with the personal information described above, we may not be able to:
- provide the requested activities or services to you, either to the same standard or at all;
  - provide you with information about activities and services that you may want;
  - tailor the content of our websites to your preferences and your experience of our websites may not be as enjoyable or useful; or
  - contact you in relation to the various activities we undertake and services we provide.
- 3.6. **For what purposes do we collect, hold, use and disclose your personal information?**
- 3.6.1. We collect personal information about you so that we can perform our activities and functions and to provide best possible quality of service.
- 3.6.2. We collect, hold, use and disclose your personal information for the purpose for which it was provided to us, related purposes set out in this privacy policy and as permitted by law. Such purposes include:
- providing services to you and sending communications requested by you;
  - answering enquiries and providing information or advice about existing and new services;
  - accessing the performance of our website and improving the operation of our website;
  - conducting service processing functions, which may include providing personal information to our various organisations, contractors, service providers or other third parties;
  - updating your personal information held by our related bodies, contractors or service providers;
  - updating our records and keeping your contact details up to date;
  - establishing and maintaining your involvement with us;
  - answering your enquiries;
  - 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. If we contact you in this way without obtaining your prior consent, we will provide you with the opportunity to decline any further promotional communications;

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<sup>1</sup> <https://www.networkadvertising.org/>

<sup>2</sup> <https://tools.google.com/dlpage/gaoptout>

- 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. In some circumstances we may need to disclose sensitive information about you to third parties as part of the services you have requested;
  - dealing with different parts of our organisation to enable the development and promotion of other community-based activities and services;
  - processing and responding to any complaint made by you;
  - tracking use of any services we offer; and
  - 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 (or political sub-division of a country).
- 3.6.3. Your personal information will not be shared, sold, rented or disclosed other than as described in this privacy policy.
- 3.6.4. If we consider there is a need to disclose your personal information outside the terms of this policy, notices provided to you and the exclusions set out in the Australian Privacy Principles we will contact you to obtain your express consent and instructions.
- 3.7. To whom may we disclose your information?**
- 3.7.1. If necessary, to carry out our functions, provide and improve our services and programs, we may need to disclose your personal and sensitive information.
- 3.7.2. This includes to the following:
- our staff (including employees, volunteers, officers and office holders), individual pastoral support, various related 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 including, without limitation, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisers 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 and other entities authorised at law to share information such as for the purposes of assessing or managing the risk of family violence;
  - any organisation for any authorised purpose with your express consent.
- 3.8. Direct marketing materials**
- 3.8.1. We may send you direct marketing communications and information about our activities and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the Spam Act 2003 (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. In addition, 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 and we will then ensure that your name is removed from our mailing list.
- 3.9. Use of Commonwealth Government identifiers**

- 3.9.1. We will not use Commonwealth government identifiers, such as Medicare numbers or your drivers' licence numbers, as its own identifier of individuals. We will only use or disclose such identifiers in the circumstances permitted by the privacy laws.

## **4. Donors and Supporters**

### **4.1. What personal information do we collect and hold?**

- 4.1.1. We will only collect personal and sensitive information that is necessary for us to carry out services and programs. The type of information we may collect, hold and use, varies depending on the purpose for which it is collected.
- 4.1.2. We may collect the following types of personal information:
- name;
  - mailing and/or street address;
  - email address;
  - telephone number;
  - facsimile number;
  - age or birth date;
  - profession, occupation or job title;
  - 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 websites or online presence, through our representatives or otherwise;
  - information you provide to us through our activities and services, surveys or visits by our representatives from time to time;
  - bank account details.
- 4.1.3. We may also collect some information 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.
- 4.1.4. For our supporters, we may need to collect your contact details such as your name, postal address, email address, phone numbers; your date of birth, gender, income, occupation; your employer details, if you participate in work place giving; your interests and opinions. As a valued financial supporter of our fundraising activities, we may also need to collect your bank account or credit card details.

### **4.2. How do we collect personal information?**

- 4.2.1. We collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect it in a variety of ways including:
- through your access and use of our website;
  - during conversations and via correspondence between you and our representatives;
  - when you register for our conferences, events or courses and when you participate in our activities;
  - when you complete a survey or make a donation.
- 4.2.2. When collecting sensitive information, upon request we will provide safe environments, facilities or arrangements to enable private and confidential collection.
- 4.2.3. We may also collect personal information from third parties including from third party entities such as fund-raising organisers, persons to whom you have given permission to share

your personal information, credit reporting agencies, law enforcement agencies and other government entities and specialist agencies that assist us in achieving our objectives.

4.2.4. When we collect personal information, we take reasonable steps to ensure that you are aware of certain matters relating to the collection of personal information, for example by providing a 'collection statement' at the time your personal information is collected. We may also require you to provide consent at the point of collection, if consent is required under the Privacy Act or other applicable laws.

4.2.5. When you provide us with personal information about other individuals, we rely upon you to:

- make them aware of this policy and any relevant collection statement;
- make them aware that you have provided us with that information; and
- obtain their consent or ensure that you are otherwise authorised to provide us with that information.

### 4.3. **Anonymity**

4.3.1. We will generally provide individuals with the option of not identifying themselves when contacting us, participating in activities or seeking to become a donor or supporter. That is unless it is unlawful to do so, or it is impracticable for us to deal with individuals who have not identified themselves or have used a pseudonym (in such circumstances we will only obtain as much personal information as is necessary to provide you with the service or assistance you require).

### 4.4. **Our website**

4.4.1. In some cases, we may also collect your personal information through the use of 'cookies'. When you access our website, we may send a cookie (which is a small summary text file containing a unique ID number) to your computer. This enables us to recognise your computer and greet you each time you visit our website without bothering you with a request to register. It also enables us to keep track of services and products you view so that, if you consent, we can send you news about those services and products. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them.

4.4.2. We also use third party vendors, including Google, to help manage our online advertising on other websites. These third-party vendors also use cookies to serve our advertisements and this enables us to learn which advertisements bring supporters to our websites. They also allow us to customise our website to your needs. To opt out of our third-party vendor's use of cookies please visit the Network Advertising Initiative opt out page<sup>3</sup> To opt out of Google's use of cookies, please visit the Google Opt Out page<sup>4</sup>.

4.4.3. In some cases, we may use analytics, including Google Analytics, to measure traffic patterns to determine which areas of our website have been visited and to measure transactions patterns in the aggregate. We use this to research our users' habits so that we can improve our online presence, information and services. Our use of Google Analytics will not involve the collection of personal information.

4.4.4. We may log IP addresses (that is, the electronic addresses of computers connected to the internet) to analyse trends, administer our website, track users' movements, and gather broad

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<sup>3</sup> <https://www.networkadvertising.org/>

<sup>4</sup> <https://tools.google.com/dlpage/gaoptout>

demographic information and for security reasons. The logging of IP addresses is not used for identifying users.

#### **4.5. What happens if we can't collect your personal information?**

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

- provide you with information about activities and services that you may want;
- tailor the content of our websites to your preferences and your experience of our websites may not be as enjoyable or useful; or
- contact you in relation to the various activities we undertake and services we provide.

#### **4.6. For what purposes do we collect, hold, use and disclose your personal information?**

4.6.1. We collect personal information about you so that we can perform our activities and functions and to provide best possible quality of service.

4.6.2. We collect, hold, use and disclose your personal information for the purpose for which it was provided to us, related purposes set out in this privacy policy and as permitted by law. Such purposes include:

- arranging our various activities, including fundraising activities;
- facilitating and managing your purchase from, or donation of goods to, one of our stores;
- managing and processing donations and providing receipts;
- accessing the performance of our website and improving the operation of our website;
- for our administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes, as well as those of our various organisations, contractors or service providers;
- updating your personal information held by our related bodies, contractors or service providers;
- updating our records and keeping your contact details up to date;
- establishing and maintaining your involvement with us;
- answering your enquiries;
- processing and responding to any complaint made by you; and
- 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 (or political sub-division of a country).

4.6.3. Your personal information will not be shared, sold, rented or disclosed other than as described in this privacy policy.

4.6.4. If we consider there is a need to disclose your personal information outside the terms of this policy, notices provided to you and the exclusions set out in the Australian Privacy Principles we will contact you to obtain your express consent and instructions.

#### **4.7. To whom may we disclose your information?**

4.7.1. If necessary, to carry out our functions, provide and improve our services and programs, we may need to disclose your personal and sensitive information.

4.7.2. This includes

- any organisation for any authorised purpose with your express consent.

#### **4.8. Direct marketing materials**



4.8.1. We may send you direct marketing communications and information about our activities and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the Spam Act 2003 (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. In addition, 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 and we will then ensure that your name is removed from our mailing list.

#### 4.9. **Use of Commonwealth Government identifiers**

4.9.1. We will not use Commonwealth government identifiers, such as Medicare numbers or your drivers' licence numbers, as its own identifier of individuals. We will only use or disclose such identifiers in the circumstances permitted by the privacy laws.

## 5. **Customers**

### 5.1. **What personal information do we collect and hold?**

5.1.1. We will only collect personal and sensitive information that is necessary for us to carry out services and programs. The type of information we may collect, hold and use, varies depending on the purpose for which it is collected.

5.1.2. As a customer at one of our many stores or social enterprises, we may need to collect your name and contact details at the time of purchase or in connection with your donation of goods.

### 5.2. **How do we collect personal information?**

5.2.1. We collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect it in a variety of ways including:

- through your access and use of our website;
- when you complete an application or purchase order;
- when you complete a survey or make a donation.
- When collecting sensitive information, upon request we will provide safe environments, facilities or arrangements to enable private and confidential collection.

5.2.2. When we collect personal information, we take reasonable steps to ensure that you are aware of certain matters relating to the collection of personal information, for example by providing a 'collection statement' at the time your personal information is collected. We may also require you to provide consent at the point of collection, if consent is required under the Privacy Act or other applicable laws.

### 5.3. **Anonymity**

5.3.1. We will generally provide individuals with the option of not identifying themselves when contacting us or participating in activities or seeking to purchase goods or services from one of our retail stores unless it is unlawful for us to do so or it is impracticable for us to deal with individuals who have not identified themselves or have used a pseudonym (in such circumstances we will only obtain as much personal information as is necessary to provide you with the service or assistance you require).

#### 5.4. **For what purposes do we collect, hold, use and disclose your personal information?**

- 5.4.1. We collect personal information about you so that we can perform our activities and functions and to provide best possible quality of service.
- 5.4.2. We collect, hold, use and disclose your personal information for the purpose for which it was provided to us, related purposes set out in this privacy policy and as permitted by law. Such purposes include:
- providing services to you and sending communications requested by you;
  - facilitating and managing your purchase from, or donation of goods to, one of our stores;
  - managing and processing donations and providing receipts;
  - answering enquiries and providing information or advice about existing and new services;
  - updating our records and keeping your contact details up to date;
  - answering your enquiries;
  - 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 (or political sub-division of a country).
- 5.4.3. Your personal information will not be shared, sold, rented or disclosed other than as described in this privacy policy.
- 5.4.4. If we consider there is a need to disclose your personal information outside the terms of this policy, notices provided to you and the exclusions set out in the Australian Privacy Principles we will contact you to obtain your express consent and instructions.

## 6. **Volunteers**

### 6.1. **What personal information do we collect and hold?**

- 6.1.1. We will only collect personal and sensitive information that is necessary for us to carry out services and programs. The type of information we may collect, hold and use, varies depending on the purpose for which it is collected.
- 6.1.2. We may collect the following types of personal information:
- name;
  - mailing and/or street address;
  - email address;
  - telephone number;
  - facsimile number;
  - age or birth date;
  - profession, occupation or job title;
  - working with children checks and/or reports and police checks;
- 6.1.3. We may also collect some information 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.
- 6.1.4. We may also collect sensitive information about you (including health information) where it is reasonably necessary for one or more of our functions or activities. For our people, as a volunteer we may need to collect information about your name and contact details, bank

account and taxation details, qualifications, previous experience and emergency contact details.

## 6.2. **How do we collect personal information?**

- 6.2.1. We collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect it in a variety of ways including:
- through your access and use of our website;
  - during conversations and via correspondence between you and our representatives;
  - when you register for our conferences, events or courses and when you participate in our activities;
  - when you complete a survey or make a donation.
- 6.2.2. When collecting sensitive information, upon request we will provide safe environments, facilities or arrangements to enable private and confidential collection.
- 6.2.3. We may also collect personal information from third parties including from third party entities such as fund-raising organisers, persons to whom you have given permission to share your personal information, credit reporting agencies, law enforcement agencies and other government entities and specialist agencies that assist us in achieving our objectives.
- 6.2.4. When we collect personal information, we take reasonable steps to ensure that you are aware of certain matters relating to the collection of personal information, for example by providing a 'collection statement' at the time your personal information is collected. We may also require you to provide consent at the point of collection, if consent is required under the Privacy Act or other applicable laws.

## 6.3. **Our website**

- 6.3.1. In some cases, we may also collect your personal information through the use of 'cookies'. When you access our website, we may send a cookie (which is a small summary text file containing a unique ID number) to your computer. This enables us to recognise your computer and greet you each time you visit our website without bothering you with a request to register. It also enables us to keep track of services and products you view so that, if you consent, we can send you news about those services and products. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them.
- 6.3.2. We also use third party vendors, including Google, to help manage our online advertising on other websites. These third-party vendors also use cookies to serve our advertisements and this enables us to learn which advertisements bring supporters to our websites. They also allow us to customise our website to your needs. To opt out of our third-party vendor's use of cookies please visit the Network Advertising Initiative opt out page<sup>5</sup> To opt out of Google's use of cookies, please visit the Google Opt Out page<sup>6</sup>.
- 6.3.3. In some cases, we may use analytics, including Google Analytics, to measure traffic patterns to determine which areas of our website have been visited and to measure transactions patterns in the aggregate. We use this to research our users' habits so that we can improve our online presence, information and services. Our use of Google Analytics will not involve the collection of personal information.

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<sup>5</sup> <https://www.networkadvertising.org/>

<sup>6</sup> <https://tools.google.com/dlpage/gaoptout>

- 6.3.4. We may log IP addresses (that is, the electronic addresses of computers connected to the internet) to analyse trends, administer our website, track users' movements, and gather broad demographic information and for security reasons. The logging of IP addresses is not used for identifying users.
- 6.4. **For what purposes do we collect, hold, use and disclose your personal information?**
- 6.4.1. We collect personal information about you so that we can perform our activities and functions and to provide best possible quality of service.
- 6.4.2. We collect, hold, use and disclose your personal information for the purpose for which it was provided to us, related purposes set out in this privacy policy and as permitted by law. Such purposes include:
- providing services to you and sending communications requested by you;
  - arranging our various activities, including fundraising activities;
  - employment and volunteering;
  - accessing the performance of our website and improving the operation of our website;
  - for our administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes, as well as those of our various organisations, contractors or service providers;
  - updating your personal information held by our related bodies, contractors or service providers;
  - updating our records and keeping your contact details up to date;
  - establishing and maintaining your involvement with us;
  - answering your enquiries;
  - direct promotion of services and keeping you informed of new developments we believe may be of interest to you. If we contact you in this way without obtaining your prior consent, we will provide you with the opportunity to decline any further promotional communications;
  - dealing with different parts of our organisation to enable the development and promotion of other community-based activities and services;
  - processing and responding to any complaint made by you;
  - tracking use of any services we offer; and
  - 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 (or political sub-division of a country).
- 6.4.3. Your personal information will not be shared, sold, rented or disclosed other than as described in this privacy policy.
- 6.4.4. If we consider there is a need to disclose your personal information outside the terms of this policy, notices provided to you and the exclusions set out in the Australian Privacy Principles we will contact you to obtain your express consent and instructions.
- 6.5. **To whom may we disclose your information?**
- 6.5.1. If necessary, to carry out our functions, provide and improve our services and programs, we may need to disclose your personal and sensitive information.
- 6.5.2. This includes to the following:
- our staff (including employees, volunteers, officers and office holders), individual pastoral support, various related 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 including, without limitation, 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;

#### **6.6. Direct marketing materials**

6.6.1. We may send you direct marketing communications and information about our activities and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the Spam Act 2003 (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. In addition, 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 and we will then ensure that your name is removed from our mailing list.

#### **6.7. Use of Commonwealth Government identifiers**

6.7.1. We will not use Commonwealth government identifiers, such as Medicare numbers or your drivers' licence numbers, as its own identifier of individuals. We will only use or disclose such identifiers in the circumstances permitted by the privacy laws.

### **7. How can you access and correct your personal information?**

7.1. You may request access to 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). We may charge you a fee to cover our administrative and other reasonable costs (eg. photocopying, faxing, etc) in providing the information to you and, if so, we may charge a reasonable fee for providing access. We will not charge for simply making the request and will not charge for making any corrections to your personal information. Depending on the nature of the request, we may ask you to verify your identity or to put your request in writing.

7.2. To request access to your personal information, please contact our Privacy Officer using the contact details below. Requests for access should include:

- confirmation of your identity;
- if the person requesting information is an authorised representative, proof that the person requesting access is lawfully authorised to do so (such as a copy of the Enduring Power of Attorney appointing the person as well as a copy of the person's drivers' licence or passport);
- specific details of the information sought so that we can identify what personal information is being requested; and
- the form in which the information is requested (for example, a copy of the information or a request to view the information contained in our records).
- There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

7.3. If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it by contacting us via the contact details below. 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.

## **8. How we comply with the Notifiable Data Breaches Scheme**

- 8.1. We will notify you in the event your personal information is involved in a data breach that is likely to result in serious harm. This notification will include recommendations about the steps you should take in response to the breach. We will also notify the Office of Australian Information Commissioner of eligible data breaches. Each suspected data breach reported to us will be assessed to determine whether it is likely to result in serious harm, and as a result require notification.

## **9. What is the process for complaining about a breach of privacy?**

- 9.1. If you believe that your privacy has been breached or you are not happy with the way your personal information has been handled by us, please contact our Privacy Officer using the contact information below and provide details of the incident (preferably in writing) so that we can investigate it.
- 9.2. We will attempt to confirm as appropriate with you your understanding of the conduct relevant to the complaint and what you expect as an outcome. We will inform you whether we will conduct an investigation, the name, title, and contact details of the investigating officer and the estimated completion date for the investigation process.
- 9.3. After we have completed our enquiries, we will contact you, usually in writing, to advise the outcome and invite a response to our conclusions about the complaint. If we receive a response from you, we will assess it and advise if we have changed our view. If you are unsatisfied with the outcome, we will advise you about further options including, if appropriate, review by the Privacy Commissioner within the Office of the Australian Information Commissioner.

## **10. Do we disclose your personal information to anyone outside Australia?**

- 10.1. We may disclose personal information to our third-party customers, suppliers and service providers located overseas for some of the purposes listed above.
- 10.2. We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

## **11. Security**

- 11.1. 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. Personal information is destroyed or de-identified when no longer needed.
- 11.2. Our websites use security encrypted response forms when personal and financial details are required. However, as our websites are 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.

## 12. Links

12.1. 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.

## 13. Contacting us

13.1. 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 Privacy Officer using the details set out below.

13.2. 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.

13.3. Please contact our Privacy Officer at:

Privacy Officer  
Uniting (Victoria and Tasmania) Limited  
Level 6, 250 Victoria Parade East Melbourne VIC 3002  
Tel: (03) 9192 8100  
Email: [privacyofficer@vt.uniting.org](mailto:privacyofficer@vt.uniting.org)

## 14. Changes to our privacy policy

14.1. We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website.

The Board is responsible for:

Responsibility

- ensuring this policy is adhered to;
- ensuring clarity on the evidence that demonstrates adherence to this policy;
- receiving regular reports that articulates evidence demonstrating policy adherence.

## Related Legislation/Regulations

- *Archives Act 1983 (Tas)*
- *Children, Youth and Families Act 2005 (Vic)*
- *Child Wellbeing and Safety Act 2005 (Vic)*
- *Family Violence Protection Act 2008 (Vic)*
- *Freedom of Information Act 1980 (Vic)*
- *Health Records Act 2001 (Vic)* and Health Privacy Principles (the HPPs)
- *Health Records and Information Privacy Act 2002 (NSW)*

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- *Information Privacy Act 2009 (Qld)*
- *Mental Health Act 2014 (Vic)*
- *Personal Information Protection Act 2004 (Tas)*
- *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)*
- *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.*

## Related Documents

Incident Management Policy  
 Incident Reporting Protocol and Procedure  
 Consumer Rights and Responsibilities Policy  
 Legislative Compliance Protocol  
 Acceptable Use Policy and Protocol  
 Information Security Policy

Revision Record			
Version	Date	Document Writer	Revision Description
0.0	30/04/2018	Policy Writer	Conversion of policy to new template and update.
0.1	21/05/2018	Policy Writer	Adapting policy template.
0.2	25/07/2018	Policy Writer	Rewrite policy and incorporate legislative updates.
0.3	15/08/2018	IT	Feedback from IT
0.4	08/11/2018	Aimee Suchard-Lowe	Redrafted for Legal review
0.5	08/11/18	Legal	Redrafted
0.6	27/11/18	Manager Policy and Professional Practice	Converted to correct template
0.7	01/12/18	Legal/ICT/Privacy Officer	Further amendments as discussed
0.8	20/03/19	Privacy Officer	Final amendments subject to ELT Review/Consumer Review process
0.9	30/04/19	Manager Policy and Professional Practice	Amended in to sections for four client groups.
0.10	09/05/19	Privacy Officer	Amendments to remove reference to data sharing with like-minded organisations as agreed with EGM S&E and other various minor amendments

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Policy Name: *Privacy Policy*  
Document Number: *UP-007*  
Policy Area: *Quality, Risk and Compliance*  
Policy Owner: *Privacy Officer*  
Endorsed by: *Board*  
Policy Version Number: *1.0*

<i>0.11</i>	<i>22/05/19</i>	<i>Manager Policy and Professional Practice</i>	<i>Updated comments from ELT review</i>
<i>0.12</i>	<i>28/05/19</i>	<i>Privacy Officer</i>	<i>Final ELT comments included</i>
<i>0.13</i>	<i>31/05/19</i>	<i>Manager Policy and Professional Practice</i>	<i>Definitions of four audience groups added</i>
<i>1.0</i>	<i>03/07/19</i>	<i>Manager Policy and Professional Practice</i>	<i>Minor updates as requested by ELT and Board - approved ELT 25/06/19 and Board 03/07/19</i>