

Privacy Policy

DCN: SUNCAR-286973199-75 Version: 3.0



Content Type	Company	Document Owner	Applied Units	Effective Date
Policy	Suncare Community Services	Risk & Compliance	All Suncare	11/01/2017

SCOPE

This policy outlines the ways in which Suncare Community Services Ltd ACN: 603561502 and its related entities (“**We**”) collect, use, disclose, store, secure, manage, and dispose of your Personal Information in accordance with the Australian Privacy Principles (“**the APP’s**”).

DEFINITIONS

Where the words “**Personal Information**” are used in this policy, it means information or an opinion that is specifically about you, or which can reasonably identify you irrespective as to whether the information or opinion is:

- (a) true or not; and
- (b) recorded in a material form or not.

Where the words “**Sensitive Information**” are used in this policy, it means information or an opinion that relates to:

- (a) your racial or ethnic origin;
- (b) your political opinions or membership of a political association;
- (c) your religions or philosophical beliefs or affiliations;
- (d) your membership of a professional or trade association or trade union;
- (e) your sexual orientation or practices; or
- (f) your health, genetic or biometric information.

THE KINDS OF PERSONAL INFORMATION WE COLLECT AND HOLD

[APP 1.4(a)]

The kinds of Personal Information we collect relating to you will depend on the nature of your relationship with us.

A. Clients

If you are a client of our organisation, we will generally collect the following particulars of your personal information in order to provide services to you:

- (a) Your name and contact details;
- (b) Your personal details, including your date of birth, gender, and income;
- (c) Details of any personal issues, experiences, or relationships relating to the types of services we provide;
- (d) Your family members and other relationships of support you may have in the community;

- (e) Your areas of interest;
- (f) Your health information, including in some cases your medical history; and
- (g) Your credit card or bank account details.

You are entitled to provide your personal information to us without identifying yourself or through the use of a pseudonym, unless:

- (a) we are required by law to only deal with individuals who have identified themselves when providing the services that you have requested we provide; or
- (b) we form the view that it is impractical to provide the services that you have requested we provide without being able to identify you personally.

In these circumstances we reserve the right to not provide services to you unless you identify yourself when providing your personal information.

B. Donors

If you provide a donation to our organisation, we may collect the following particulars of your personal information in order to process and properly document your donation:

- (a) Your name and contact details;
- (b) Your personal details, including your date of birth, gender, and income;
- (c) Your areas of interest;
- (d) Your history of making donations to our organisation; and
- (e) Your credit card or bank account details.

Donors of our organisation are generally entitled to provide personal information to us without identifying themselves or through the use of a pseudonym, however where you request that we provide you with a receipt for your donation, or if it is necessary for us to report benefactors to our organisation in the interests of transparency, we may require you to identify yourself when making a donation.

C. Business Partners

If you are business partner of our organisation, we will generally collect the following particulars of your personal information in order to either provide services to you or engage you to provide goods or services to our organisation:

- (a) Your name and contact details;
- (b) The details of the business or organisation that you represent;
- (c) Your areas of interest; and
- (d) The form of goods or services that you provide to our organisation.

D. Staff, Volunteers and Contractors

If you are a current or prospective staff member, volunteer, or contractor of our organisation, we will generally collect the following particulars of your personal information in order to engage your services:

- (a) Your name and contact details;
- (b) Your personal details, including your date and place of birth, your citizenship, residency and/or visa details, your gender, and your designated emergency contact;
- (c) Your employment history, including details of past employers or references;
- (d) Your relevant skills and experience, including qualifications, driver's licence details and languages spoken; and
- (e) Your bank account details.

Employees should note that generally our relationship with you will be exempt from the *Privacy Act 1988 (Cth)* and as such the personal information we collect from you that is directly related to your employment with us need not be handled by us in accordance with the APP's. This means you are not entitled to access your employment records under the APP's.

We reserve the right to conduct criminal and/or medical history searches or enquiries regarding all current and prospective employees.

E. Members

If you are a member of our organisation, we will generally collect the following particulars of your personal information in order to properly document your membership and keep you apprised as to the activities of our organisation:

- (a) Your name and contact details;
- (b) Your personal details, including your date of birth;
- (c) Your areas of interest; and
- (d) Your credit card or bank account details.

F. Online Visitors

We collect website activity statistics such as the number of visitors, pages visited, time and date of visit and where you accessed our website from, so that we can make informed decisions relating to improving our website and the services we deliver. This information is anonymous and doesn't identify a person.

When you visit our website a cookie is placed on your computer. The cookie does not contain personal information that can identify you, but may contain information about the page you visited on our website. If you do not wish for this to occur, you can remove cookies from your computer, by following the standard procedures applicable to your internet browser.

Our website may from time to time contain links to other websites. These websites may not be administered by our organisation and as such may abide by a privacy policy or standard that differs to this document. You should consult the privacy policy outlined on each website in order to verify how that website collects, uses, discloses, stores, secures, manages and disposes of Personal Information.

HOW WE COLLECT AND HOLD YOUR PERSONAL INFORMATION

[APP 1.4(b)]

We will collect the majority of your Personal Information from you directly, generally through your completion of a form or questionnaire submitted to us, through a face-to-face meeting or interview with you or via telephone, email,

Document ID	Version	Document Type	Date Accessed
SUNCAR-286973199-75	3.0	Policy	26/04/2018
Privacy Policy	Page 3 of 7		

or mail correspondence. In some cases the Personal Information we obtain from you may include Sensitive Information where our collection of such information is necessary in order to adequately provide the services you have requested we provide to you.

We may also obtain your Personal Information from third party sources, including without limitation:

- (a) Other organisations that provide services to you of a similar nature to the services we provide, or that are otherwise responsible for your ongoing care or wellbeing;
- (b) Government Departments or Agencies by undertaking searches or by request; or
- (c) Medical Practitioners or Allied Health Professionals where your personal health is concerned.

We will always take all reasonable steps to obtain your consent before contacting any third party for the purposes of collecting your Personal Information. We will not collect your Sensitive Information from a third party without your informed consent.

SECURITY OF YOUR PERSONAL INFORMATION

We take all reasonable steps to protect the Personal and Sensitive Information we hold concerning individuals against misuse, interference, loss, unauthorised access, modification, and disclosure.

These steps include password protection for accessing our electronic IT system, securing paper files in locked cabinets, and physical access restrictions. Only authorised personnel are permitted to access the Personal Information we hold.

When Personal Information is no longer required, it is destroyed in a secure manner, or deleted according to our internal 'Control of Records Procedure'.

WHY WE COLLECT, HOLD, USE, AND DISCLOSE YOUR PERSONAL INFORMATION

[APP 1.4(c)]

The purposes for which we collect, hold, use and disclose your personal information will depend on the nature of your relationship with us. Generally, we collect, hold, use and disclose personal information for the following purposes:

- (a) To deliver services to our clients across the ageing, disability, and mental health sectors;
- (b) To process donations and provide accurate documentation to record donations to our organisation;
- (c) To manage our relationships with business partners and the provision and receipt of goods and services to or from them;
- (d) To engage the services of, and document our relationship with, staff, volunteers and contractors;
- (e) To communicate effectively with our members and ensure our obligations arising under our organisation's constitution are met;
- (f) To monitor and evaluate the standard and quality of services we provide;
- (g) To provide clients with information about other services that we, our related entities and other organisations that we have affiliations with, offer that may be of interest to them;
- (h) To produce annual reports and other publications relating to our activities within the community; and
- (i) To facilitate our internal administration and business operations, including the fulfilment of any legal requirements.

HOW YOU MAY ACCESS OR SEEK THE CORRECTION OF PERSONAL INFORMATION HELD BY US [APP 1.4(d)]

You may access or seek the correction of any Personal Information held by us by contacting our Privacy Officer using the contact details provided below:

Mailing Address: The Privacy Officer
 Suncare Community Services
 PO Box 1896
 Sunshine Plaza QLD 4558
 Australia

Telephone: 1800 786 227

For security reasons, where you are requesting the disclosure of certain Personal Information we hold in our records relating to an individual, we will require you to provide a written request for such information accompanied by proof of your identity.

We will take all reasonable steps to provide you with access to inspect, take notes, or obtain print outs of Personal Information that we hold about you within 14 days of your request. Where your request for access to your Personal Information is complicated or requires access to a large volume of information, we will take all reasonable steps to provide access to the requested information within 30 days.

We reserve the right to charge you reasonable fees to reimburse us for the cost we incur relating to any request for access to information, including in relation to photocopying and delivery cost of information stored off-site.

Please note that we will be unable to provide you with access to Personal Information we hold on your behalf in the following circumstances:

- (a) Where we form the reasonable belief that providing you with access to the Personal Information would pose a serious threat to the life, health, or safety of a person or to public health or public safety;
- (b) Where providing access to the Personal Information would have an unreasonable impact on the privacy of others;
- (c) Where a request for Personal Information is frivolous and vexatious;
- (d) Where Personal Information relates to existing or anticipated legal proceedings between our organisation and the individual to which the Personal Information relates, and the Personal Information would not be accessible by the process of discovery in those proceedings;
- (e) Where providing an individual with Personal Information would reveal our intentions in relation to negotiations with that individual in a way which would prejudice those negotiations;
- (f) Where providing access to the Personal Information would be unlawful;
- (g) Where we are required or authorised to deny access to the Personal Information by Australian law or by order of a court or tribunal;
- (h) Where we have reason to suspect that unlawful activity or serious misconduct has been or may be engaged in and providing access to the Personal Information would prejudice taking appropriate action in relation to the matter;
- (i) Where giving access would be likely to prejudice the activities of one or more government enforcement bodies; or
- (j) Where giving access would reveal commercially-sensitive, evaluative information gathered by us.

HOW YOU MAY COMPLAIN ABOUT A BREACH OF THE APP'S BY US

[APP 1.4(e)]

If at any stage you feel we have breached the APP's in our collection, use, disclosure, storage, security, management or disposal of your Personal Information, you may lodge a complaint with our Privacy Officer using the contact details below:

Mailing Address: The Privacy Officer
 Suncare Community Services
 PO Box 1896
 Sunshine Plaza QLD 4558
 Australia

Telephone: 1800 786 227

We are committed to protecting your privacy and as such we treat all complaints very seriously. If you are not satisfied with our handling of your complaint or the outcome we propose to resolve your complaint, you are entitled to lodge a "Privacy Complaint Form" with the Office of the Australian Information Commissioner. Copies of this form and details relating to lodgement are available at www.oaic.gov.au/privacy/making-a-privacy-complaint.

We keep records of all privacy-related complaints and their outcome.

We are unable to deal with anonymous complaints given the difficulty associated with properly investigating and following up such complaints. We will generally however note the issues raised by an anonymous complaint and where appropriate try and investigate and resolve them appropriately.

OUR DISCLOSURE OF YOUR PERSONAL INFORMATION

[APP 1.4(f)]

We may in the course of providing services to you disclose your Personal Information to the following recipients:

- (a) Government agencies or departments who provide funding to our organisation;
- (b) Third party contractors whose services we engage in order to provide the services you have requested we provide to you;
- (c) Our professional advisers, including our accountants, auditors, and lawyers; and
- (d) Other regulatory bodies as required by law.

We will only disclose your Personal Information to a third party in one or more of the following circumstances:

- (a) Where you have granted your prior consent to such a disclosure;
- (b) Where you would reasonably expect us to disclose your personal information in order to provide the services you have requested we provide to you;
- (c) Where we are required to disclose your Personal Information to a third party by law;
- (d) Where our disclosure of your Personal Information will prevent or lessen a serious threat to a person's life, health, or safety or to public health or safety;
- (e) Where it is necessary with regards to suspected unlawful activity, or misconduct of a serious nature that relates to our functions or activities;
- (f) Where it will prevent or lessen a serious threat to somebody's life, health or safety or to public health or safety;
- (g) Where it is reasonably necessary to assist in locating a missing person;

- (h) Where it is reasonably necessary to establish, exercise or defend a claim at law;
- (i) Where it is reasonably necessary for a confidential dispute resolution process;
- (j) Where it is reasonably necessary for the enforcement of a law conducted by an enforcement body;
- (k) Where it is otherwise required or authorised by law.

DISCLOSURE OF PERSONAL INFORMATION TO OVERSEAS RECIPIENTS

All Personal Information that we hold is stored within Australia and we take all reasonable steps to ensure that it is not stored or disclosed outside Australia.

If an occasion arises that requires your Personal Information to be disclosed outside Australia, we will advise you of the location the disclosure is likely to occur so that your informed consent to the disclosure can be obtained.

When any disclosure of Personal Information occurs outside Australia we will take all reasonable steps to ensure the use, disclosure, storage, security, management, and disposal of that Personal Information is in accordance with this Policy and subject to safeguards equal to or superior to those afforded by Australian law.

THIRD PARTY SOFTWARE PROVIDERS

It is acknowledged that for the purpose of service delivery we may from time to time use third party software providers and your personal information may be provided for service delivery purposes to a third party software provider. We will take all reasonable steps to ensure that software provider complies with this Policy.