

PARKINSON'S AUSTRALIA POLICY	
Policy Name	Privacy Policy
Policy Number	6.0 (version 1.0)
Date of Approval	31 July 2014
Date of Review	31 July 2015

1. Purpose

Parkinson's Australia (PA) is the national not-for-profit body working for all people affected by Parkinson's, through advocating for, lobbying about and effective communication of, their interests.

The purpose of this policy is to provide information which:

- promotes a better understanding of the types of "personal information" (including the subcategory of "sensitive information") that PA handles
- communicates the practices of PA in relation to its handling of personal information, including its collection, use, storage, disclosure
- sets out a transparent process for handling personal information within PA, including for managing requests for access to and correction of personal information, and for making privacy complaints.

2. Policy statement

PA values and respects an individual's right to privacy and is committed to safeguarding the privacy of all persons who interact with PA, including its members, volunteers, donors, employees and users of its electronic media (website, social media).

This policy explains the ways in which PA handles personal information in the course of carrying out its services and functions, while recognising and safeguarding the right of individuals to have their information handled in ways they would reasonably expect and in ways that protect the privacy of their personal, financial and health information.

3. Legal obligations

PA is not directly subject to the provisions of the *Privacy Act 1988* (Cth), as it does not fall within the definition of the bodies (agencies, organisations and small business operators) to which that legislation applies.

However, PA receives funding from the Commonwealth Department of Social Services (Commonwealth HACC program) to assist in servicing people over the age of 65, living with Parkinson's disease. Under the terms of the Commonwealth funding agreement, PA is contractually required to comply with the Australian Privacy Principles (APPs) set out in the *Privacy Act 1988 (Cth)*, in relation to the delivery of services funded under that agreement.

4. Definitions

personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

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

sensitive information means:

- (a) information or an opinion about an individual's:
 - (i) racial or ethnic origin; or
 - (ii) political opinions; or
 - (iii) membership of a political association; or
 - (iv) religious beliefs or affiliations; or
 - (v) philosophical beliefs; or
 - (vi) membership of a professional or trade association; or
 - (vii) membership of a trade union; or
 - (viii) sexual orientation or practices; or
 - (ix) criminal record;that is also personal information; or
- (b) health information about an individual; or
- (c) genetic information about an individual that is not otherwise health information; or
- (d) biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or
- (e) biometric templates.

5. What kinds of personal information does PA collect?

Depending upon your relationship with PA (eg. as a member, financial supporter, service recipient, employee or volunteer), we may collect different types of personal information from you, including:

- contact details (name, address, telephone number, email address etc.)
- personal details including: date of birth, gender
- education and employment history; taxation details
- donation history
- credit card numbers or bank account details.

If it is reasonably necessary in the circumstances, we may also collect sensitive information such as health status (whether a sufferer of Parkinson's disease or related neurodegenerative condition; country of birth; date of diagnosis). However, we will only collect your health or other sensitive information if we obtain your consent, or are otherwise permitted by law to undertake such collection. Where practicable, we will explain how your health or other sensitive information will be used or disclosed.

6. How PA collects personal information

Information may be collected when you:

- make a financial donation to PA
- subscribe to any PA publication, including electronic publications
- provide details to PA in an application, consent form, survey, feedback form or incident report
- contact PA in person or via telephone, mail or email, or engage with PA via social media
- access the PA website
- participate in any program, activity, competition or fundraising event run by PA
- are elected or appointed to PA's Board of Directors, or a sub-committee thereof
- apply for employment or a volunteer position with PA.

We may also collect personal information about someone else from you. For example, you may wish to:

- make an 'in memoriam' donation, and have confirmation of the donation sent to the family of the deceased.

Where you provide us with personal information about other people, you must have their consent to do this, and to provide it to PA on their behalf. If not, you must tell us at the time the information is provided.

Depending on the circumstances, some types of information will be required and others might be optional. If you do not provide some or all of the information requested, this may affect PA's ability to communicate with you or provide the requested products or services.

Anonymity and pseudonymity

Wherever it is lawful and practicable, you have the option not to identify yourself or to use a fictitious name when interacting with PA. You can remain anonymous or use a pseudonym when using PA's website or interacting with PA via social media. However, it may be necessary for PA to collect your name in order to provide you with some services (eg. issuing of tax receipts for financial donations).

7. Use of personal information

PA will use your personal information for purposes which are directly related to the reason you provided the information, and where you would reasonably expect us to use that information.

Depending upon the circumstances of its collection, we may use information for:

- processing donations and providing receipts
- administering our register of members
- seeking ongoing financial support for PA, or recognising existing support
- extending invitations to upcoming events and activities
- providing follow-up information in response to questions or comments
- seeking feedback about PA's services and functions to monitor and evaluate existing activities, and plan for future service delivery
- providing information about research trials and other initiatives offered by external providers that may be of interest to PA members or supporters
- facilitating and managing an individual's employment or volunteer relationship with PA
- complying with necessary business and accounting standards

We will not use your personal information for any other purpose unless you have given your consent or one of the exceptions under the *Privacy Act 1988* applies.

Use for direct marketing

From time to time, we may use the information we collect from you to let you know via mail, email, telephone or online about PA news, products or services, or to solicit donations. All such communications will include details regarding the recipient's entitlement to 'opt-out' of receiving direct marketing communications from PA, and PA will comply with any such 'opt-out' request as soon as practicable.

PA will not sell, rent, share or disclose your personal information to any third party for direct marketing purposes.

8. Disclosure of personal information

Where necessary, PA may disclose your personal information:

- to its professional advisers, including its accountants, auditors and lawyers
- to relevant Commonwealth and state government funding agencies
- in other circumstances permitted by law.

PA does not normally send personal information out of Australia. Should we be required to send information overseas, we will undertake to protect your personal information, by ensuring that the country concerned has similar protections in relation to privacy or by entering into contractual arrangements.

9. Security of personal information

PA holds personal information in a number of ways, including in electronic databases, email contact lists, and in paper files held in filing cabinets (locked where appropriate) or in archive storage boxes. PA's policy is to take reasonable steps to protect the personal and sensitive information we hold against misuse, interference, loss or unauthorised access, modification and disclosure.

The steps we take to protect the personal information we hold include physical security for PA's office premises, securing paper files in locked cabinet, relevant access control mechanisms for our IT resources (such as encryption, firewalls, anti-virus software and login and password protection), and personnel security and training and workplace policies.

When the personal information is no longer required, and can legally be disposed of, it is destroyed in a secure manner in accordance with PA's Record Retention and Disposal Policy.

Payment security

PA processes donations using EFTPOS and online technologies. PA's policy is to ensure that all transactions processed electronically meet industry security standards to ensure payment details are protected.

If an individual uses their credit card and the transaction is processed manually, the transaction record will be stored by PA for the period that financial records are required by law to be retained, following which it will be destroyed in a secure manner.

Internet and social media security

While PA strives to protect the personal information and privacy of users of its internet and social media sites, we cannot guarantee the security of any information that you disclose online and you disclose that information at your own risk. If you are concerned about sending your information over the internet, you can contact PA by telephone or post (see *contact details below*).

You can also help to protect the privacy of your personal information by keeping your passwords secret, utilising anti-virus software, and by ensuring that you log out of the website or social media site when you have finished using it. In addition, if you become aware of any security breach on our internet or social media sites, please let us know as soon as possible.

Third party websites

Links to third party websites that are not operated or controlled by PA are provided for your convenience only. PA is not responsible for the privacy or security practices of those third

party websites, which are not covered by this Privacy Policy. We recommend that you review the privacy and security policies of those third party websites before supplying any personal information to them.

10. Access to and correction of personal information

PA will take reasonable steps to ensure that all personal information that we collect, hold, and use or disclose is accurate, up- to-date, complete, relevant and not misleading. You can also help us to keep your information up to date by letting us know about any changes to your personal information, such as your postal or email address or phone number.

You may request to access or correct your personal information at any time by contacting PA's Privacy Officer (*see contact details below*). We will give you access to the information unless one of the exceptions under the *Privacy Act 1988* applies (eg. if providing access would be unlawful or denying access is authorised by law). If you request to access or correct your personal information, we will respond within a reasonable time (usually within 30 days). If your request is refused, we will give you a written notice setting out the reasons for refusal.

11. Complaints procedures

PA is committed to the protection of your privacy. If you have any questions about how we handle personal information, or would like to complain about how we have handled your personal information, or would like further information about our Privacy Policy, please submit a written query or complaint to our Privacy Officer. Our Privacy Officer will assess any queries or complaints and will liaise with you to resolve any issues within a reasonable time (usually within 30 days).

12. How to contact Parkinson's Australia

We welcome and appreciate your feedback or comments in relation to our Privacy Policy and our handling of personal and sensitive information.

Telephone: 0407 703 328

Email: info@parkinsons.org.au

Post: PO Box 717, Mawson ACT 2607

13. Changes to this Privacy Policy

PA will review this policy annually, and may amend or update it from time to time. If relevant privacy legislation and/or governance codes or contractual obligations are introduced or amended, the policy will be updated accordingly, and we will summarise any substantial modifications or enhancements in this section of the policy.

The current version of the policy will be posted on our website, and a copy may be obtained free of charge from our Privacy Officer (*see contact details above*).

14. Responsibilities / Delegations

Protection of privacy is a prime responsibility for all PA Board members, employees, volunteers and contractors working for the organisation. The following have further specific responsibilities:

- President of Parkinson's Australia for developing and maintaining a Privacy Policy for the organisation
- Parkinson's Australia Board Members for establishing and maintaining oversight of PA's privacy compliance regime
- PA **Privacy Officer** for establishing and maintaining appropriate privacy training and awareness programs for PA staff and volunteers, and for responding to privacy-related enquiries and complaints from members of the community who interact with PA.
- PA Employees, volunteers and contractors for exercising due diligence to prevent, detect and report any breaches of privacy or other matters bearing on the policy and privacy issues.

RELATED POLICIES

8.0 Record Retention and Disposal Policy

CHANGE HISTORY

Version	Approval Date	Approved By	Change
0.1			Parkinson's Australia Privacy Policy Drafted June 2014
1.0	31 July 2014	Parkinson's Australia Board	Approved at Board meeting of 31 July 2014