

## Privacy Policy – Draft

**Please note this is a draft policy pending final approval**

### Introduction

Alzheimer's Australia values your privacy and takes reasonable steps to protect your personal information (that is, information which identifies or may reasonably be used to identify you). We abide by the requirements of the Privacy Act 1988 (Cth) ("Act") in relation to the collection and use of your personal information and comply with other applicable laws protecting privacy including State and Territory health information legislation. By providing personal information to us, you consent to our collection, use and disclosure of that information on the terms of this privacy policy and any other contractual or other arrangements (if any) that may apply between us.

The Privacy Act provides you with a number of rights, including the right:

- to know why your personal information is being collected, how it will be used and whether it can be given to anyone else;
- to see what information is held about you and have it corrected if it is incorrect, out of date or incomplete (the Freedom of Information Act 1982 also covers this)
- to have your personal information stored securely and protected from unauthorised access or misuse; and
- to know the complaints procedure if you believe your privacy has been infringed

### Scope of this Policy

This Policy describes how your privacy is respected and protected in accordance with the Australian Privacy Principles. It applies to all information we hold about you through your use of our services including information obtained via electronic devices (e.g. computer mobile phone or other consumer electronic device) used to access our services.

### What personal information we collect

Alzheimer's Australia collects personal information about service users, supporters, employees, volunteers and contractors but this is limited to that which is necessary for us to undertake our services and activities. Many of our services and activities allow you to remain anonymous or use a pseudonym if you wish. However, if you choose to provide us with your personal information, it will generally be in relation to:

- Providing services to clients – Alzheimer's Australia collects your, and your family members' names, addresses and other contact details, dates of birth, other information about your needs and circumstances (such as living arrangements), records of communication and as otherwise required in order to provide our services and communicate with you. With consent, this information may involve details about your health including dementia related information such diagnosis, other associated health issues, services and supports in place, correspondence with the client's health and other service providers and other sensitive information. The specific information will depend on the type of service provided and will be collected before and during the provision of services.
- Donors - when you make a donation, including via the website, Alzheimer's Australia collects and stores in our fundraising database your name, email address, mailing address, payment and billing details (including credit card details if relevant), and other contact information.

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This information is used to process your donation, complete your tax receipt, send you further information about Alzheimer's Australia and for promotional purposes.

- Supporters and volunteers - Alzheimer's Australia may also collect names, addresses and other contact details, records of communication between you and Alzheimer's Australia and other personal information about current and potential supporters and volunteers so that we can encourage, record and acknowledge your support and communicate with you about Alzheimer's Australia and our activities.
- Distributing publications - we collect contact details (which may include name, address, email address, and mobile phone number) when you interact with us in order to distribute newsletters and other communications in print and electronic form from time to time. You may choose to be removed from our distribution lists by contacting us.
- Conducting events – we collect contact details, donation history and other personal information, including photographs and videos, about those who wish to join or participate in our events and programmes. This information is used to administer these activities and to promote and seek support for such events and for the activities of Alzheimer's Australia. With consent, this information may include health or other sensitive information.
- Assisting with your queries - you may choose to provide us with your name or other contact details when you call us by phone or write to us so that we can respond to your requests for our newsletter or for other information about Alzheimer's Australia services or operations.
- Conducting our general business activities - Alzheimer's Australia collects personal information about individuals who are, or are employed by, our suppliers (including service and content providers), contractors and agents for our general business operations.
- Applying for a position (as a volunteer or employee) with Alzheimer's Australia – we may collect your personal information, including name and contact details, information about your working history and relevant records checks (including criminal and working with children checks) when you apply for a position with us, in order for us to assess your suitability for that or other positions.

We may ask you for other information to enable us to better understand our clients, donors and others who deal with us, but the provision of that information is purely voluntary

## How and when we collect your personal information

It is our usual practice to collect personal information directly from you or your authorised representative such as a carer, guardian or other responsible person. We collect information from an authorised representative if you have consented for us to collect the information in this way, or where it is not reasonable or practical for us to collect this information directly from you (such as in an emergency, because you are not able to provide the information required or where collection in this way is a reasonable and efficient way to collect the information without inconvenience to you). Sometimes we collect personal information from publicly available sources or other third parties to, for example, support our fundraising activities or for a specific activity such as investigating a complaint. Should you be contacted as a result of this, you will be given the opportunity to opt out of any future similar communication.

If you choose not to provide certain personal information to us, we may not be able to provide you with the services you require or communicate with you.

Alzheimer's Australia also collects limited information about all visitors to our online resources which is used only to identify generic behavioural patterns.

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We use Google Analytics to track visits to our website to monitor its effectiveness, maintain our server and improve our services. Types of data collected include:

- server address;
- top level domain name (for example .com, .gov, .au, etc.);
- the date and time of your visit to the site;
- the pages you accessed and documents downloaded during your visit;
- the previous site you visited;
- if you've visited our site before; and
- the type of browser used.

These statistics will not identify you as an individual.

Google Analytics is a web analytics tool that helps website owners understand how visitors engage with their website. Google Analytics customers can view a variety of reports about how visitors interact with their website so they can improve it. For more information read Google's Privacy Policy.

## How we use your personal information

We use and disclose personal information we collect:

- to provide and improve our services to our clients and their family members, including to:
  - identify and provide services required including those offered by third parties;
  - allow exchange of information between service providers with whom Alzheimer's Australia deals on behalf of clients;
  - assess the adequacy of, and our clients' and their family members' level of satisfaction with, our services;
- to communicate with our clients and their family members, donors and supporters, and volunteers (including responding to queries and complaints) and distributing our publications, conducting events and raising awareness about our services;
- to process donations and communicate with our donors and supporters, including sending them information (which may be by phone, email or other electronic means);
- to undertake our general business activities, including interacting with contractors and service providers, billing and administration including measuring and assessing the level of support we receive and the effectiveness of our fundraising activities and assessing applicants for positions with us; and
- where:
  - you consent;
  - we are required or authorised by law to use or disclose the information for another purpose; or
  - the disclosure of the information will prevent or lessen a serious and imminent threat to somebody's life or health.

We will not share any of your personal information with third parties without your consent except:

- if we are required by law or we believe in good faith that such action is necessary in order to comply with law, cooperate with law enforcement or other government agencies, or comply with a legal process served on the company (including other service providers or insurers) or court order;
- if the disclosure of the information will prevent or lessen a serious and imminent threat to somebody's life or health;

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- to our contractors, service providers and volunteers to the extent necessary for them to perform their duties to us; or
- if you are a client, to your family members or your health or other service providers; for the purpose of providing our services to you and only with your consent (unless one of the other purposes of disclosure listed above applies).

We are obliged to report to government and other bodies on the services they fund us to provide. Reports cover demographic and service use information only – your personal information will not be passed on so cannot be matched with Medicare, Centrelink or any other records about you.

## Who will have access to your personal information?

Unless we are required to provide it to others for purposes identified above, your personal information will only be seen or used by people working for us and our contracted service providers, for example, secure mailing houses to enable us to send out appeals and other donation requests. These contractors are bound by privacy legislation which restricts the use of that information to the purpose for which it is provided; prohibits the copying or use of that information for any other purpose; and requires the destruction or return to us of that information once the purpose for which it has been provided has been served.

Alzheimer's Australia operates on a federated model with state organisations operating as separate entities. As such your information will only be available to staff within the state where you contact us. Should you wish to receive services in another state, your consent will be sought to share your information.

## Security of your personal information

We regard the security of your personal information as a priority and implement a number of physical and electronic measures to protect it. All staff and volunteers who may have access to your information are required to sign a confidentiality agreement and if contract service providers are used, they will be bound by our Privacy Policy.

We remind you, however, that the internet is not a secure environment and although all care is taken, we cannot guarantee the security of information you provide to us via electronic means.

## Data quality

We take all reasonable steps to ensure that the personal information we collect is accurate, up to date and complete. This includes maintaining and updating personal information when we are advised it has changed and at other times as necessary.

## Cross border data transfer

Alzheimer's Australia operates only within Australia and will not provide your information to parties in any other country. We do from time to time, however, use web-based programs for particular activities such as email broadcast which may be hosted offshore but only when the supplier is bound by privacy laws and has compliant practices in place.

## Accessing and correcting your information

You are entitled to view the information we hold about you and reasonable requests for access will be responded to as quickly as possible. Access to a large amount of information or information from various sources within the organisation may take time before we can respond.

If you wish to view the information we hold about you, please contact the Privacy Officer on:

Email: [Nat.admin@alzheimers.org.au](mailto:Nat.admin@alzheimers.org.au)

# Privacy Policy

Mail: Privacy Officer, Alzheimer's Australia, 1 Frewin Place, Scullin ACT 2614

Phone: (02) 6254 4233

Fax: (02) 6278 7225

If we refuse to give you access to information we will give a reason for this decision. Generally, if requested, we will amend any personal information which you demonstrate is inaccurate, incomplete or not current, and will remove any information that is not relevant. If we disagree with your view on these matters we will keep a note on the file setting out your view of the information held.

## On-line transactions

The Alzheimer's Australia website is enabled for online transactions using a certified secure payment gateway. However, despite the security on the site, you should be aware that there are inherent risks in transferring information across the Internet and we cannot accept liability for any breaches.

When an Internet donation is made, your credit card number is used only to make a debit and not retained by us. We record on our fundraising database the donor's name, address, email, telephone, amount donated, and if the funds are for a specified gift. Our fundraising database is protected by secure user IDs and passwords, to help protect it from misuse, unauthorised access, modification or disclosure.

## Email communication

We strive to be efficient with the funds that have been entrusted to us. As email can be sent at a lower cost compared to surface mail we offer our donors/supporters the opportunity to supply their email address for mailing purposes. We will only send you an email when there is an important message we would like you to know about.

When making a donation on the Internet, you are given the option to opt out of receiving future mailing. You may remove your name from this database at any time through the 'Unsubscribe' link on the email.

## Security measures for online donations

Donations made online on the website are processed in real time using a secure payment gateway. Donations are processed in Australia (and for all other countries) in Australian Dollars. If you have any questions about making an online donation to Alzheimer's Australia please [contact us](#).

This website has security measures (minimum 128-bit secure sockets layer encryption) designed to protect against the loss, misuse and/or alteration to your personal information under our control. Secure pages on our website are protected by a 128-bit SSL certificate. A security icon visible on your screen, for example a padlock, confirms that your browser supports SSL security. Click on the security icon to verify the security certificate on this website.

## Links to other websites

The Alzheimer's Australia websites may contain links to third party websites, and third party websites may also have links to Alzheimer's Australia's websites. This Privacy Policy does not apply to external links or other websites who may also collect your personal information. We encourage you to read the privacy policies of any website you link to from our website.

## Agreeing to these terms (use constitutes acceptance)

Your continued use of the website indicates that you accept the conditions of this Privacy Policy and consent to the collection and use by us of any personal information you provide while using this site. If you do not agree to the privacy and security terms as set out here, please do not use this website.

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## Effective date and updates

This is the current Privacy Policy of Alzheimer's Australia. This policy was last updated in April 2014 and replaces any other Privacy Policy for the organisation published on the website to date. Unless stated otherwise, this Policy applies to all information that we have about you. Alzheimer's Australia may at any time vary this policy by publishing an updated version on this website. You accept that by using this website that we have provided you with sufficient notice of the variation.

## Changes to this Privacy Policy

We reserve the right, as it may be necessary, to review, revise or make changes to our Privacy Policy and will notify you of those changes by posting those changes on our web site.

## Additional Information

Additional information on the Australian Privacy Principles can be obtained from [www.privacy.gov.au](http://www.privacy.gov.au).

## More Information or Complaints

If you would like more information about our Policy, the way we manage your personal information or are concerned that we may have breached your privacy and wish to make a complaint, contact the Privacy Officer by -:

Email: [Nat.admin@alzheimers.org.au](mailto:Nat.admin@alzheimers.org.au)

Mail: Privacy Officer, Alzheimer's Australia, 1 Frewin Place, Scullin ACT 2614

Phone: (02) 6254 4233

Fax: (02) 6278 7225