



Strategic Communications & Connections

SCC :03 Privacy Policy

Our Vision

Making an impact with compassion and integrity.

Our Values

VIBRANT by being energetic and engaging.

OPENNESS by being welcoming, honest and transparent.

INNOVATION in driving new ideas, opportunities to build a better community.

COLLABORATION by embracing new ideas, teamwork and partnerships.

EXCELLENCE through being recognised as leaders in the community.

Strategic Communications & Connections

Policy No. SCC 03 - Privacy Policy

INTRODUCTION

3Bridges Community Limited (“3Bridges”, “we”) is committed to handling personal Information in a lawful manner that protects people and supports the community’s trust.

This Policy sets out the principles that 3Bridges must follow when handling personal Information, to ensure compliance with its obligations under the Privacy Act 1988 (Cth) and other applicable laws, regulations, industry standards and contractual obligations.

PURPOSE

This Policy, and the handling of personal information by 3Bridges, must be consistent with the requirements of the Australian Privacy Principles, and must ensure that 3Bridges:

- (a) Is transparent about the way it handles personal information and the reasons why it is collected.
- (b) Only collects, uses and discloses personal information if necessary to perform its functions or activities.
- (c) Takes reasonable steps to keep personal information secure.
- (d) Conducts activities in accordance with this policy and appropriate procedures.

WHAT IS PERSONAL INFORMATION?

“Personal information” means any information or opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable. In general terms, this includes information or an opinion that personally identifies you either directly or indirectly.

WHAT PERSONAL INFORMATION DO WE COLLECT?

The personal information we collect about you depends on the nature of your dealings with us or what you choose to share with us.

The personal information we collect about you may include:

- Your name, postal address, telephone number and/or email address, along with your preferences as to when and how we should contact you in the future.
- Health and/or medical history
- Financial information which you give to us, such as credit card details or direct debit forms
- Guardianship applications
- Medicare, Pension, DVA numbers
- GP details.
- My aged care assessments
- Allied health reports.

- Information you enter on our website forms.
- Records of your history, correspondence and actions taken with us.
- Images, photographs or videos taken during 3Bridges events or services.
- Details of the pages you visit on our website, including technical information such as the IP address and location you use to access the website, your browser type and version.
- Any other details in which you give us

3Bridges does not generally collect sensitive information about you (e.g. information or opinion about your racial or ethnic origin, political opinions, political association, religious or philosophical beliefs, membership of a trade union or other professional body, sexual orientation or practices, criminal record, health information, genetic information, biometric information or biometric templates). If we need to record or hold your sensitive information, we will do so only with your consent or as otherwise required or authorised by law, and we will take appropriate measures to protect the security of this information.

You do not have to provide us with your personal information. Where possible, we will give you the option to interact with us anonymously or by using a pseudonym. However, if you choose to deal with us in this way or choose not to provide us with your personal information, we may not be able to provide you with our services or otherwise interact with you.

HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

We collect your personal information directly from you when you:

- Contact us via our website, email, phone or forms.
- Visiting any of our websites, mobile apps or social media pages contributing or providing personal information, including by making comments on our message boards or discussion forums.
- Participating in or responding to any survey we conduct.
- Applying for a job with us (including volunteers)
- Participate in any of the 3Bridges services or programs.
- Are a new or current client.

HOW DO WE USE/DISCLOSE YOUR PERSONAL INFORMATION?

3Bridges collects personal or health information for the purpose of delivering direct services, administering processes associated with service delivery, for purposes such as referrals, meeting any requirements for government funding, monitoring or evaluating the services we provide, to comply with legal obligations or to produce annual reports or for research purposes.

3Bridges only uses personal information for the purposes for which it was given to us, or for purposes which are in relation to one of our services. We may also disclose information to other external organisations such as funding bodies, contractors who work for us, health care professionals who assist us to deliver services, other regulatory bodies, or our professional advisors including our accountants, auditors and solicitors.

Any personal or health details collected will not be disclosed to any other person or agency external to 3Bridges without the individual's consent or unless required or authorised by law. If we receive information about an individual from a third party, 3Bridges will take all reasonable steps to contact that individual to ensure that they are aware of the purposes for which we are collecting that information.

It should be noted that 'use' and 'disclosure' are separate practices, with 'use' being the handling or management of information within 3Bridges, whereas 'disclosure' is when information is released from our control to another individual or entity.

Exemptions for disclosure

A legal requirement to disclose personal information may override the APPs; this is known as a 'duty of care'. Situations where this may occur include the following:

- Where there is serious risk of abuse or physical harm to the individual or other person, including our clients, the general public and own staff
- Where the disclosure is required under a law
- Where the individual would reasonably expect us to use or give that information, e.g. referral processes
- When the disclosure is necessary by or for a law enforcement agency (e.g. prevention, investigation, prosecution or punishment of criminal offences, protection of public revenue, preparation or implementation of a court or tribunal order.)

In the event that a legal need for disclosure arises, the staff member will inform their supervisor or manager prior to making the decision to breach confidentiality and privacy. This decision will also be communicated to the individual, unless such advice to the individual is not allowed by legislation.

ONLINE ACTIVITY

Cookies

The 3Bridges website uses cookies. A cookie is a small file of letters and numbers the website puts on your device if you allow it. These cookies recognise when your device has visited our website(s) before, so we can distinguish you from other users of the website. This improves your experience and the 3Bridges website(s).

We do not use cookies to identify you, just to improve your experience on our website(s). If you do not wish to use the cookies, you can amend the settings on your internet browser so it will not automatically download cookies. However, if you remove or block cookies on your computer, please be aware that your browsing experience and our website's functionality may be affected.

Website analytics

Our website uses tracking technologies to help us better understand visitor traffic, so we can improve our services. Although this data is mostly anonymous, it is possible that under certain circumstances, we may connect it to you.

Direct marketing

We may send you direct marketing communications and information about our services, opportunities, or events that we consider may be of interest to you if you have requested or consented to receive such communications. These communications may be sent in various forms, including mail, SMS and email, in accordance with applicable marketing laws, such as the Australian Spam Act 2003 (Cth). You consent to us sending you those direct marketing communications by any of those methods. If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.

You may opt-out of receiving marketing communications from us at any time by following the instructions to "unsubscribe" set out in the relevant communication and/or contacting us using the details set out in the "How to contact us" section below.

RETENTION OF PERSONAL INFORMATION

We are committed to not retaining your personal information for longer than we need to. In most cases, this means that we will only retain your personal information for the duration of your relationship with us unless we are required to keep your personal information to comply with applicable laws, for example record-keeping obligations, or for other legitimate business reasons.

Archiving of Client Records

Client files/records are archived when they are completed or no longer required due to client exit or death. Information is stored and archived for a period subject to Public Records Act 1973. Concern Australia recognises that individuals who have lived in care may wish to access their personal information at some time in the future. As such, such personal files will be archived for their convenience. Archived information is stored securely separate to active files. Only workers authorised to access archives have access to these. Authorisation is through the Chief Executive Officer, Business Operations Manager or General Manager Service Delivery.

HOW TO ACCESS AND CORRECT YOUR PERSONAL INFORMATION

We will endeavour to keep your personal information accurate, complete and up to date.

If you wish to make a request to access and / or correct the personal information we hold about you, you can make a request by contacting us using the details set out in the "How to contact us" section below and we will usually respond within 2 days. You can also request for us to delete your personal information and we will endeavour to do so unless we are required to retain your personal information to comply with applicable laws, for example record-keeping obligations.

LINKS TO THIRD PARTY SITES

3Bridges website(s) may contain links to websites operated by third parties. If you access a third party website through our website(s), personal information may be collected by that third party website. We make no representations or warranties in relation to the privacy practices of any third party provider or website and we are not responsible for the privacy policies or the content of any third party provider or website. Third

party providers / websites are responsible for informing you about their own privacy practices and we encourage you to read their privacy policies.

ENQUIRIES AND COMPLAINTS

For complaints about how 3Bridges handles, processes or manages your personal information, please contact us using the details set out in the “How to contact us” section below. Note we may require proof of your identity and full details of your request before we can process your complaint.

Please allow up to 2 days for 3Bridges to acknowledge your complaint and approximately 30 business days to address the complaint. Depending on the circumstances, we may need longer to address your complaint but if we do, we will keep you updated.

HOW TO CONTACT US

If you have a question or concern in relation to our handling of your personal information or this statement, you can contact us for assistance as follows:

Email: clientconnections@3bridges.org.au

Contact number: 1300 327 434

Further Actions

| File | Documentation |
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| | <p>Federal Privacy Amendment (Enhancing Privacy Protection) Act 2012</p> <p>Federal Privacy Act 1988 (Cth) which incorporates the amendments made to it by the Privacy Amendment (Private Sector) Act 2000 (Cth).</p> <p>Australian Privacy Guideline Principles.</p> <p>Workforce Handbook – HR 01</p> <p>Code of Behaviour – HR F09</p> <p>Privacy & Confidentiality Agreement - Board form BG F10</p> |