



VOTSA

Veterans Off The Streets Australia - VOTSA Ltd
ABN 46 613 632 045

PRIVACY POLICY

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Position	Name	Contact No
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INTRODUCTION

Veterans Off The Streets Australia - VOTSA Ltd (VOTSA) (ABN 46 613 632 045) recognise that your personal or sensitive information is important to you and that you are concerned with its collection, use and disclosure. We are bound by the Australian Privacy Principles as set out in the Privacy Act 1988 (Cth) which set clear standards regarding these activities.

This policy contains information about:

- the kinds of personal information we collect and hold;
- how we collect and hold it;
- the purpose for which we collect, hold, use and disclose it;
- your right to access and seek correction of it; and
- how you may complain about privacy matters.

VOTSA performs our functions and services across Australia. We will only collect personal and sensitive information that is necessary for us to carry out these functions and provide the services.

VOTSA only collects personal information for the purposes which are directly related to our functions or activities and only when it is necessary for or directly related to such purposes. These include:

- Client Care Services
- Appeals and Donations
- Event participation
- Employment/Volunteering
- Website statistics
- Marketing purposes

APPLICATION

VOTSA collects personal information about clients, donors, employees, volunteers, service users, and contractors. However this is limited to information which is necessary for VOTSA to undertake our services and activities. In general this information is collected from you or your representative but we may also obtain information from other sources.

WHAT IS PERSONAL INFORMATION?

Essentially 'personal information' means 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 and protected in accordance with this policy.

WHAT IS SENSITIVE INFORMATION?

'Sensitive information' (a type of personal information), means information or an opinion about an individual's race or ethnic origins, political opinions and associations, religious beliefs or affiliations, philosophical beliefs, sexual preferences or practices, trade or professional associations and memberships, union membership, criminal record, health or genetic information or biometric information.

WHAT SENSITIVE INFORMATION DO WE COLLECT AND HOLD?

There are very few circumstances where we collect sensitive information – for example, as part of information collected about directors, employees and volunteers for company and human resource management purposes. Where such information is collected, we will only do so if you have provided your consent or where required by law.

WHY WE COLLECT, HOLD, USE AND DISCLOSE PERSONAL INFORMATION

We collect, hold, use and disclose personal information for a number of purposes connected with our business operations, which include:

- providing you services – including as a client, online or by phone;
- activities in relation to appeals and donations;
- event participation;
- employment, volunteering and membership;
- dealing with requests, enquiries, complaints, and other client care related activities;
- marketing our products and services and providing advice on our products and services;
- developing and improving our products and services;
- providing you with products;
- the operation and administration of accounts or subscriptions that you have with us;
- payment processing;
- carrying out certain checks (for example, for our fraud or theft prevention processes);
- carrying out any activity in connection with a legal, governmental or regulatory requirement that we have to comply with, or in connection with legal proceedings, crime or fraud prevention, detection or prosecution; and
- website statistics.

We retain all documents, both hard copy and electronic, in accordance with our normal document retention practices for accounting, legal and business purposes. If personal information is included in such a document it will be retained, even though its retention may not be the primary purpose for keeping the record.

Generally, you have no obligation to provide any personal information requested by us. However, if you choose not to do so there may be circumstances when we cannot provide you with services that you want.

WHAT PERSONAL INFORMATION WE COLLECT

The kinds of personal information we collect or which we may hold about you may include:

- your name;
- your address;
- your date of birth;
- your telephone number(s);
- your e-mail address;
- your military history;
- medical history provided to us by you, a family member, friend, acquaintance or other third party;
- details of your financial and other personal circumstances provided to us by you, a family member, friend, acquaintance or other third party
- profession, occupation or job title;
- donation information;
- receipts and transaction records in relation to your financial support for our fundraising activities;
- copies of your written correspondence with us;
- copies of your application form, request for assistance and/or other associated documents (including documents generated during your participation in a program with, or otherwise during your interactions with us) and information that you may provide to us in relation to the services we offer;
- copies of your volunteer agreement or employment agreement and any associated documents and information you provide to us in connection with your volunteering, employment or membership with VOTSA; and
- your Internet Protocol ("IP") address, server address, domain name and information on your browsing activity when visiting one of our websites.

HOW WE COLLECT AND HOLD YOUR PERSONAL INFORMATION

How we collect and store personal information varies depending on the purpose for which it is collected but may include the following:

- when you request services from us;
- when another person, such as family member, friend or acquaintance, contacts us about you;
- when you make a donation;
- when you register for event;
- when you apply to become a member or volunteer;
- when you subscribe to our catalogues or mailing lists;
- when you enter competitions or promotions that we run;

- when you browse one of our websites;
- when you submit an enquiry using one of our websites;
- when you complete surveys or provide online feedback or service reviews; and
- when you publicly comment about us on social media sites (for example so that we can answer questions about our services).

Generally, we will collect your personal information directly from you. However, we may also receive information about you from your family members, friends, acquaintances or other third parties, such as other veteran relief organisations, community and charitable organisations or government departments.

We also hold information, collected incidentally, concerning individuals who work for companies or organisations that have a business relationship with us. We hold personal information as part of customer records and other electronic documents on which personal information is contained which are stored on our information technology systems and servers operated by third parties who provide services to us in connection with our business.

SHARING YOUR PERSONAL AND SENSITIVE INFORMATION

Duty of Care

In certain circumstances, should your communication with us raise safety concerns, we may need to pass on your contact information to authorities who can help protect you and/or others, such as a crisis intervention services or the police. Where possible we will work with you openly, letting you know if our concerns reach the point where we need to involve other services. We are obliged to try to protect you and/or others if the information you submit tells us that:

- a. you are being seriously hurt by someone else.
- b. you are thinking of seriously harming yourself.
- c. someone else is being, or is likely to be, seriously hurt by you or another person.

In General

We may disclose or receive personal information or documents about you to/from:

- other community organisations who provide services to us;
- organisations that provide services to us in connection with our services, including customer support, payment processing, administration, archival, data storage, hosting, research, mail and delivery, installation, distribution, logistics, marketing, auditing, share registry, consulting, financial and legal advisory, banking, debt collection, security or technical services and the operation of our websites;
- law enforcement agencies to assist in the prevention, investigation and prosecution of criminal activities; and
- other third parties where you have specifically consented to the disclosure of information to these third parties.

- Sensitive information is subject to additional rules – namely sensitive information:
 - will only be used and disclosed for purposes which are directly related to the primary purpose of collection;
 - will never be used for the purpose of direct marketing; and
 - will not be disclosed to any related bodies corporate.

MARKETING

We may send you direct marketing communications and information, including newsletters, about our products and services and other information we consider may be of interest to you by email.

To opt-out of receiving our marketing materials, you will need to unsubscribe from our marketing database. To do this, simply select the "unsubscribe" option in one of the emails that you receive from us.

DISCLOSURE FOR LEGAL REASONS

We reserve the right to communicate such of your personal or sensitive information as we hold to third parties which may make a request for its disclosure with which we are obliged by law to comply.

DISCLOSURE OF PERSONAL INFORMATION TO OVERSEAS RECIPIENTS

It is our policy to require all of our overseas sharing of personal information to be done in a way which requires observance of strict privacy and security standards, both during transit and at the overseas destination.

We may allow your personal information to be shared or stored with trusted partners in countries other than your own location. We do this:

- where we store our data with a trusted service provider who is in the business of providing data storage and processing services. Examples are those who store and process our email and mobile application data. These services commonly involve diverse geographic locations which change from time to time for reasons which include data protection and processing efficiency. Where these services are used by us, it is not practical for us to notify you of which country your personal information may be located in; and
- when our business which collected your personal information is in a different country to your location.

SECURITY OF YOUR PERSONAL INFORMATION

We will take reasonable steps to ensure that the personal information that we hold is stored in a secure environment protected from misuse, interference and loss and any unauthorised access, modification or disclosure.

ON LINE SECURITY

VOTSA's website processes traffic in real time using a secure payment gateway. This website has security measures using 256-bit secure sockets layer (SSL) encryption designed to protect against the loss, misuse and/or alteration to your personal information under our control.

PAYMENTS AND DONATIONS

The VOTSA website is enabled for online transactions using a secure payment gateway. All transactions are processed in Australia. 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 a donation or payment for services is made, your credit card details are transmitted through the eWAY interface and are hosted by eWAY after processing. VOTSA does not retain your credit card details.

HOW TO ACCESS, CORRECT AND UPDATE YOUR PERSONAL INFORMATION

Upon your request, we will provide access to your personal information that we hold (except in certain circumstances set out in the Privacy Act 1988 (Cth)). We reserve the right to charge you a reasonable fee for providing access to your personal information if your request requires substantial effort on our part. We will, of course, require some proof of your identity before providing information to you.

You may also request us to correct the personal information that we hold about you. If you do so and we are satisfied that, having regard to a purpose for which the information is held, the information is inaccurate, out-of-date, incomplete, irrelevant or misleading, we will take such steps as are reasonable in the circumstances to correct your personal information to ensure that, having regard to the purpose for which it is held, the information is accurate, up-to-date, complete, relevant and not misleading.

To request access to the personal information that we hold about you, or to update or correct that personal information, please send a written request to The Privacy Officer, Veterans Off The Streets Australia Ltd, either by email to privacy@votsa.org.au or by post to Veterans Off The Streets Australia - VOTSA Ltd PO Box 309 Civic Square ACT 2608.

In addition if you are a subscriber to our newsletter and information database you can also update your details via the "unsubscribe" option in one of the emails that you receive from us.

RETENTION OF PERSONAL INFORMATION

We will retain personal information in accordance with our document retention policies. When personal information is no longer required and there is no other reason for us to hold the information, we will either destroy or de-identify it.

HOW TO MAKE A COMPLAINT

If you are concerned that the way we collect, hold, use or disclose your personal information may be in breach of the Australian Privacy Principles, please send written details of your complaint to VOTSA, either by email to secretary@votsa.org.au or by mail to

Veterans Off The Streets Ltd
PO Box 309
Civic Square ACT 2608.

HOW WE WILL HANDLE COMPLAINTS

After receiving a complaint, we will consider whether we need any further information from you to properly consider and investigate the complaint, and may request such information from you. We will then:

- conduct internal review with the business units involved in the collection, holding, use or disclosure of your personal information which is the subject of your complaint, and evaluate whether we believe that such collection, holding, use or disclosure of your personal information was in breach of the Australian Privacy Principles; and
- notify you of the results of our investigation of your complaint.

If the conclusion of our investigation is that our collection, holding, use or disclosure of your personal information was in breach of the Australian Privacy Principles, we will take steps to remedy the breach as soon as reasonably practicable.

We will endeavour to notify you of the results of our investigation of your complaint within 30 days of receiving your complaint. However, if your complaint involves complex matters or requires extensive investigation and consultation, it may not be possible to respond within this timeframe.

If you are not satisfied with our response to your complaint you are entitled under the Privacy Act 1988 (Cth) to make a complaint to the Office of the Australian Information Commissioner. Information about how to make a complaint is available from the Office of the Australian Information Commissioner's website (www.oaic.gov.au).

ADDITIONAL INFORMATION FOR USERS OF OUR WEBSITES

If you visit our website www.votsa.org.au (the "Website") to read, browse, contact us or download information, our system may record information such as the date and time of your visit to the Website, the pages accessed and any information downloaded.

This information is used:

- (i) for statistical and reporting purposes;
- (ii) for website administration, security and maintenance purposes; and
- (iii) to direct you to material on our Website that we believe will be of interest to you.

Like many websites, our Website may use "cookies" from time to time. Cookies are small text files that we transfer to your computer's hard drive through your web browser to enable our systems to recognise your browser and your log-in status. Cookies may also be used to record non-personal information such as the date, time or duration of your visit, or the pages accessed, for website

administration, statistical and maintenance purposes. Any such information will be aggregated and not linked to particular individuals. The default settings of browsers such as Internet Explorer usually allow cookies, but users can easily erase cookies from their hard-drive, block all cookies, or receive a warning before a cookie is stored. Please note that some parts of our Websites may not function fully for users that disallow cookies.

While we take great care to protect your personal information on our Website and use state-of-the-art data transmission encryption. Unfortunately no data transmission over the Internet can be guaranteed to be 100% secure. Accordingly, we cannot ensure or warrant the security of any information that you send to us or receive from us online. This is particularly true for information you send to us via email. We have no way of protecting that information until it reaches us. Once we receive your transmission, we use our best efforts to ensure its security in our possession.

The Website may contain links/ plug-ins to other sites. We are not responsible for content of, or the privacy practices or policies of, those sites.

Except as otherwise expressly discussed in this Privacy Policy, this document only addresses the use and disclosure of information we collect from you. Personal information that you disclose to other parties through our site, whether they are browsers, other users of our site or other sites on the Internet which access our information, is not protected by our Privacy Policy. We are not responsible for the practices employed by Websites linked to or from our Website nor the information or content contained therein. Often links to other Web sites are provided solely as pointers to information on topics that may be useful to the users of our site.

Please remember that when you use a link to go from our Website to another Web site, our Privacy Policy is no longer in effect. Any browsing and interaction with other Web sites, including Web sites that have a link on our Web site, is subject to that Web site's own rules and policies. Please read those rules and policies before proceeding.