

<b>Operational Policy: Communications Policies</b>			
<b>6.1</b>	<b>Privacy Policy</b>		
<b>Version:</b>	<b>1</b>	<b>Review:</b>	<b>Dec 2017</b>

This document is our privacy policy and it tells you how we collect and manage your personal information.

## Privacy Policy

Solve Disability Solutions values every individual’s privacy, and recognises the importance of protecting the privacy and the rights of individuals in relation to their personal information. Protecting your privacy and your personal and health information is an important aspect of the way we create, organise and implement our activities.

All personal information including sensitive information collected by Solve Disability Solutions is collected, managed and disclosed in accordance with the laws aimed to help protect Victorians’ privacy. These are:

- The Privacy Act 1988 (Cth) **(Act)**
- Privacy Data and Protection Act 2014 (Vic)
- The Health Records Act (Vic)

## What is your personal information?

When used in this privacy policy, the term “personal information” has the meaning given to it in the Act. In general terms, it is 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.

## What personal information do we collect and hold?

Collecting personal and health information enables Solve Disability Solutions to create, organise and implement our activities.

We will only collect personal and health information that is necessary to perform these functions.

A comprehensive list of the type of personal information we may collect is provided in *Table 1: Personal Information collected by Solve Disability Solutions*.

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## How do we collect your personal information?

We collect your personal information directly from you unless it is unreasonable or impracticable to do so.

We may also collect personal information from individuals acting on your behalf, such as health professionals, carers or family members. (If you are providing us with personal and health information about other individuals, Solve Disability Solutions relies on you to make them aware that such information has been provided to us and that Solve Disability Solutions may provide information to the Department of Health & Human Services (DHHS) for statistical purposes.)

We may also collect personal information from third party companies, such as law enforcement agencies, government entities, or financial services providers, such as online fundraising platforms.

A comprehensive list of the way we collect personal information is provided in *Table 1: Personal Information collected by Solve Disability Solutions*.

## What happens if we can't collect your personal information?

If you do not provide us with the personal information described above, some or all of the following may happen:

- we may not be able to provide the requested products or services to you, either to the same standard or at all;
- we may not be able to provide you with information about services that you may want;
- we may not be able to employ you as a Solve volunteer; or
- we may not be able to complete some administrative services, such issuing receipts, obtaining feedback, etc.

## For what purposes do we collect, hold, use and disclose your personal information?

The information we collect is for the purposes of processing enquiries, requests, registrations, donations and/or for promotional purposes. We will only use the personal and health information provided for the purposes for which it was collected.

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Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

A comprehensive list of the why we collect personal information and how we use it is provided in *Table 1: Personal Information collected by Solve Disability Solutions*.

## To whom may we disclose your information?

We may disclose your personal information to:

- our employees, volunteers, related contractors or service providers for the purposes of operation of our service, and fulfilling requests by you. This may include, without limitation, IT systems administrators, couriers, payment processors, electronic network administrators, and professional advisors such as accountants, solicitors, business advisors and consultants;
- any organisation for any authorised purpose with your express consent; and
- any government or legislative bodies, to the extent that we are required or authorised by law to do so.

Solve occasionally uses personal information, including photos or video, to promote and educate others about our service. In this instance, we will only use personal information with the express consent of the individuals featured. Permission will be considered to have been granted exclusively to Solve Disability Solutions, and as such, will not be copied, linked or used in any way other than as agreed to by the individuals featured.

We do not disclose personal information to third party suppliers and service providers located overseas.

## Direct marketing materials

We may send you direct marketing communications containing information about our services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the *Spam Act 2003* (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. In addition, at any time you may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list.

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## How can you access and correct your personal information?

You may request access to any personal information we hold about you at any time by contacting us (see the details below). Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you).

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment then we will add a note to the personal information stating that you disagree with it.

## What is the process for complaining about a breach of privacy?

If you believe that your privacy has been breached, please contact us using the contact information below and provide details of the incident so that we can investigate it.

Our procedure for investigating and dealing with privacy breaches, '*How to make a complaint*', can be downloaded from our website under the 'Service/How Projects Operate' tab.

## Security

We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure. We may hold your information in either electronic or hard copy form. Personal information is destroyed or de-identified when no longer needed.

As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

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## Links

Our website may contain links to other websites operated by third parties, such as fundraising platforms, and you will be informed when this is the case. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing you about their own privacy practices.

## Contacting us

If you have any questions about this privacy policy, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please use the contact link on our website or contact our Privacy Officer using the details set out below.

We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in a timely and appropriate manner.

Please contact our Privacy Officer at:

Privacy Officer  
 Solve Disability Solutions Inc.  
 Post: c/- Royal Talbot Rehab Centre, 1 Yarra Boulevard, Kew, 3101.  
 Tel: 1300 663 243 or (03) 9853 8655  
 Email: info@solve.org.au

## Changes to our privacy policy

We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website.

This privacy policy was last updated on 20<sup>th</sup> August, 2015.

<b>Update History</b>	<b>Actions</b>
20/8/2015	Policy created

**Table 1: Personal information collected by Solve Disability Solutions**

<b>Who does Solve collect personal information from?</b>	<b>What information do we collect? (Refer 'Table 2: Information Groupings' for more detail)</b>	<b>How do we collect it?</b>	<b>Why do we collect this information and how do we use it?</b>
Client	Personal, Contact, Health, Financial, Project	In person, website, phone, fax, email, mail, via 3 <sup>rd</sup> party (eg. carer, therapist, family member).	<ul style="list-style-type: none"> <li>• To provide you with the best service possible.</li> <li>• To answer your questions and obtain feedback about our service</li> <li>• To promote or educate others about our service</li> <li>• To assist us with future Solve projects or service queries</li> <li>• To process your payments</li> <li>• To meet legislative or governmental regulations and reporting requirements</li> </ul>
Volunteer	Personal, Contact, Financial, Work, Project	In person, website, phone, fax, email, mail, Expression of Interest form, law enforcement agencies, government entities.	<ul style="list-style-type: none"> <li>• For recruitment purposes</li> <li>• For employment and security checks, such as Police Checks and Working With Children checks</li> <li>• To help us assign you to the most appropriate type of project work</li> <li>• To maintain a record of the work you have performed for Solve</li> <li>• To keep you informed about Solve's service and operations</li> <li>• To process reimbursements.</li> <li>• To meet legislative or governmental regulations and reporting requirements</li> </ul>
Employee	Personal, Contact, Financial, Work, Health (work related), Project	In person, phone, fax, email, mail, law enforcement agencies, government entities.	<ul style="list-style-type: none"> <li>• For recruitment purposes</li> <li>• For employment and security checks, such as Police Checks and Working With Children checks</li> <li>• To maintain a record of your employment with Solve</li> <li>• To process employment related payments</li> <li>• To meet legislative or governmental regulations and reporting requirements</li> </ul>
Subscribers (Friend of Solve, Solutions magazine)	Contact, Financial	In person, phone, fax, email, mail	<ul style="list-style-type: none"> <li>• To keep you informed about Solve's service and operations</li> <li>• To process your payments and issue receipts, and provide you with timely renewal notices</li> <li>• To meet legislative or governmental regulations and reporting requirements</li> </ul>

<b>Who does Solve collect personal information from?</b>	<b>What information do we collect? (Refer 'Table 2: Information Groupings' for more detail)</b>	<b>How do we collect it?</b>	<b>Why do we collect this information and how do we use it?</b>
Donor	Contact, Financial	In person, phone, fax, email, mail, online fundraising platforms donations (eg. myCause)	<ul style="list-style-type: none"> <li>• To keep you informed about Solve's service and operations.</li> <li>• To request further financial support as part of our fundraising campaigns</li> <li>• To receive and process your donations, and issue receipts</li> <li>• To meet legislative or governmental regulations and reporting requirements</li> </ul>
Referring Agent	Contact, Work, Project	In person, phone, fax, email, mail	<ul style="list-style-type: none"> <li>• To enable Solve to provide the best possible service for our clients</li> <li>• To answer your questions, and obtain feedback, about our service</li> <li>• To keep you informed about Solve's service and operations.</li> <li>• To meet legislative or governmental regulations and reporting requirements</li> </ul>
Funding Agent	Contact, Financial	Phone, fax, email, mail	<ul style="list-style-type: none"> <li>• To obtain and forward information about project/client funding</li> <li>• To process payments and issue receipts</li> <li>• To meet legislative or governmental regulations and reporting requirements</li> </ul>

**Table 2: Collection groupings**

<b>Collection Group</b>	<b>Definition</b>
Contact	Information that enables us to contact you, such as name, address, phone number, email, etc.
Personal	Additional information that helps us to personally identify you, such as date of birth and gender.
Health	Information about you that relates to your physical condition, such as any disabilities or medical conditions.
Work	Information that relates to your current or past work history, such as workplace, occupation, skills, tools, resumes, referees, etc.
Financial	Information that enables us to process incoming and outgoing financial transactions, receipts and reimbursements, such as bank account details, payment plans, etc.
Project	Project-specific information, including photos and video.