



Privacy Policy

Policy #: 50

Category: Finance and Risk

Previous Review Date: New

Last Reviewed: 28/05/2019

Next Review: 2021

Purpose & Scope:

Swan City Youth Service Inc. recognises the importance of protecting personal information and is committed to respecting your privacy rights. This Privacy Policy tells you how we collect information from you and what we do with it.

We are compliant with the Australian Privacy Principles in the *Privacy Act 1988 (Cth) (Act)* in relation to the handling of personal information. A full version of the Australian Privacy Principles, contained in Schedule 1 of the Act, can be found at the Office of the Australian Information Commissioner website – <http://www.oaic.gov.au/>.

Definitions:

For the purposes of this Privacy Policy, all references to “SCYS”, “we”, “us” or “our” in this statement are references to Swan City Youth Service Inc.

The terms “client” or “you” in this statement includes all visitors to our website, clients of our service, funders and users of our services.

The term “services” refers to the services offered by SCYS.

The term “our website” refers to our website at <https://www.scys.com.au>.

Policy:

SCYS only collects personal information that is necessary or directly related to our business functions or activities. Personal information will always be obtained lawfully and fairly, and will be collected directly from you whenever it is reasonable and practicable to do so. SCYS will also never collect sensitive information such as information relating to racial or ethnic origin, political opinions or associations, membership of professional or trade associations or unions, religious or philosophical beliefs, criminal records, health or sexual orientation without your consent, unless we are required to do so under Australian law or unless it is otherwise necessary to provide our services.

Guiding Principles:

Collection and Use of Information

We collect information from you when you submit an enquiry (including in person, by telephone or through our website), when you use our services, and when you register for access to our resources or have other dealings with us.

The kinds of personal information SCYS gathers may include:

- ✚ your name and address (including mail, email and telephone details);
- ✚ date of birth;



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- + details relating to your employment which are relevant to us;
- + payment information, such as credit card or bank details;
- + transaction details relating to your use of our services; and
- + any other data that is included in data which you submit to us.

If SCYS receives personal information from you that we did not ask for, and that personal information is sensitive information or is not reasonably necessary for our functions or activities, we will destroy or de-identify the information.

It is unlikely that SCYS will use the services of an overseas data centre, however if we do store your information in an overseas data centre it will be done in compliance with the *Privacy Act 1988* (Cth) and we will inform you prior to any storage of data overseas. We may disclose your information to third parties outside of SCYS if you give us express permission to do so, or if we are required to do so by law.

We may disclose your personal information to third parties who directly work with us in our business to provide, promote or improve the services you have requested or are interested in. Employees and officers of SCYS have access to personally identifiable information. All employees are bound to uphold this policy and observe your right to privacy and confidentiality.

You do not have to disclose your personal information to us, however if it is not disclosed, further assistance or access to our services may not be possible. You may request that we do not transfer any of your information outside of Australia, or revoke our permission to do so, but in such case we may not be able to provide the services or products you have requested from us.

SCYS will only use your personal information for the purposes of:

- + collection of monies (ie, donations). This will include sending you newsletters and receipts;
- + sending you system alert messages to let you know about changes to our services including planned outages, availability of new functionality, software updates, changes to our Privacy Policy and possibly other documents and agreements;
- + improving the services we offer. We may occasionally conduct online surveys that may ask you for demographic information (your location, your position, etc). We will only use the information collected if you have granted us permission to do so, and only for the purposes of conducting that survey. You are free to revoke permission at any time by notifying us in writing;
- + meeting legal requirements such as complying with court orders and valid subpoenas;
- + sending you promotional material that you “opt-in” to receive.

We store all emails and endeavour to keep records of all communications so we have a history of our interactions with you that may subsequently be used for our support services.



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Opt-out Notifications

You may opt-out of receiving email communications from SCYS at any time. You need to email us to have us exclude your email from our email distribution list. We endeavour to process opt-out notifications immediately, but please allow up to ten business days for the removal to be completed.

Tracking Usage

The use of cookies and tracking technology may record information such as Internet domain and host names, Internet protocol (IP) addresses, browser software and operating system types, click-stream patterns, and dates and times that our site is accessed. The use of cookies and other tracking technologies allows us to improve our website and your browsing experience. We may also evaluate information that does not contain personal information for trend analysis.

Other Websites

You may be able to access other sites by clicking on links that we have provided on any part of our website. We are not responsible for the privacy practices or the content of these linked websites.

Change Notifications

Any changes to this Privacy Policy will be posted to our website. Changes to our Privacy Policy will become effective as of the date we post on our website and will generally be notified by means of an update on our website. Our Privacy Policy is also available by contacting our Privacy Officer by email at the address detailed below.

Data Accuracy and Security

Every effort will be made to ensure the security of your personal information to protect it from misuse, interference, loss or unauthorised access, and to ensure that your personal information is complete and accurate. If your data changes, then you are responsible for notifying us of those changes so that we can keep your details up-to-date and accurate. When no longer needed, reasonable steps will be taken to ensure that your information is destroyed and/or de-identified. Unless an exemption under the Privacy Act applies, we will, at your written request, provide you with a copy of any personal information which we hold about you. We will inform you of any applicable fee and obtain your agreement to it before providing any information.

Privacy Queries, Corrections and Complaints

To access, correct or update your personal information, or to raise a question or concern or complaint regarding SCYS' collection and use of personal information please email us at reception@scys.org.au

Or notify us by mail at:

Swan City Youth Service Inc.

PO Box 2118

MIDLAND WA 6936



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Any complaint regarding our collection or use of your personal information (**Privacy Complaint**) must be made in writing either by email or post to our office. Your complaint should set out the type of personal information that is the subject of the complaint, and details of the alleged improper collection or use.

Within 5 business days of receiving a Privacy Complaint, SCYS will respond to you acknowledging receipt of the complaint. This acknowledgement will also include the contact details of the person responsible for reviewing your Privacy Complaint, and an estimated substantive response time. SCYS will then conduct a review of your Privacy Complaint and provide you with a substantive response within 20 business days of the receipt of your Privacy Complaint. The substantive response will also include information regarding how you may make a complaint to the Information Commissioner should you not be satisfied by our response.

For more information on your rights regarding complaints, please refer to the website for the Office of Australian Information Commissioner at <https://www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint>

Destruction of records

When SCYS no longer requires your personal information, and has no legal obligation to maintain records of it, we will either destroy or de-identify your personal information.

Notifiable Data Breach

If SCYS identifies reasonable grounds to believe that unauthorised access or disclosure of your personal information has occurred, or that your personal information has been lost and is at risk of being subject to unauthorised access or disclosure, then SCYS will notify you in writing and provide you with a copy of the written statement which SCYS provides to the Information Commissioner. The following information will be included in the written statement:

- ✚ a description of the possible data breach that may have occurred;
- ✚ what kind of personal information has potentially been affected;
- ✚ recommended steps you should take in order to protect yourself; and
- ✚ if applicable, the details of the source of the data breach if SCYS has reasonable grounds to believe the data breach was constituted by a third party.

Should SCYS be unable to contact you, then we will publish the above information on our website.