



WARRNAMBOOL & DISTRICT COMMUNITY HOPICE PRIVACY STATEMENT

Your privacy is important

This statement outlines **Warrnambool & District Community Hospice's** policy on how the organisation uses and manages personal information provided to or collected by it.

Warrnambool & District Community Hospice is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act and is compliant with the Privacy Amendment (Enhancing Privacy Protection) Act 2012. In relation to health records, **Warrnambool & District Community Hospice** is also bound by the Victorian Health Privacy Principles which are contained in the Health Records Act 2001.

Warrnambool & District Community Hospice may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to the organisation's operations and practices and to make sure it remains appropriate to the changing legal environment.

This privacy policy assumes that you are resident in Australia. If you are resident in the UK or Europe, please contact us for more information regarding how we treat your personal information.

What kind of personal information does **Warrnambool & District Community Hospice** collect and how do we collect it?

We collect, hold, use and disclose your personal information for the following purposes including but not limited to:

- to provide information and services that support the provision of end-of-life care at home;
- to assess the performance of the website and to improve the operation of the website;
- to conduct business processing functions including providing personal information to our contractors, service providers or other third parties;
- for the administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes of **Warrnambool & District Community Hospice**, its contractors or service providers;
- to process and respond to any complaint made by you; and
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country (or political sub-division of a country).

Personal Information you provide:

Warrnambool & District Community Hospice will generally collect personal information held about an individual by way of

- through your access and use of our website;
- during conversations/meetings between you and our representatives;
- when you request information about our events and services;
- when you subscribe to our mailing list; or
- When you register for an event.

You do have the right to seek to deal with us anonymously or using a pseudonym, but in almost every circumstance it will not be practicable for us to deal with you or provide any services to you except for the most general responses to general enquiries, unless you identify yourself.

Personal Information provided by other people:

In some circumstances **Warrnambool & District Community Hospice** may be provided with personal information about an individual from a third party, such as a referring medical or community service provider.

In relation to employee records:

Under the Privacy Act the Australian Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to **Warrnambool & District Community Hospice's** treatment of an employee record, where the treatment is directly related to a current or former employment relationship between **Warrnambool & District Community Hospice** and employee. However, **Warrnambool & District Community Hospice** must provide access and ensure compliance with the Health Privacy Principles under the Victorian Health Records Act 2001. Privacy obligations extend to contractors' and volunteers' records, as they are not caught by the employee records exemption. Any job applicants are also excluded from the employee records' exemption.

How will Warrnambool & District Community Hospice use the personal information you provide?

Warrnambool & District Community Hospice will use personal information it collects from you for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected, or to which you have consented.

In relation to direct marketing, **Warrnambool & District Community Hospice** will use your personal information for direct marketing where you have provided that information, and you are likely to expect direct marketing: only then you will be sent direct marketing containing an opt out. If we use your personal information obtained from elsewhere we will still send you direct marketing information where you have consented and which will also contain an opt out. We will always obtain your consent to use sensitive information as the basis for any of our direct marketing.

We may use video surveillance for security purposes and the footage will be used only by **Warrnambool & District Community Hospice** and by the providers of our security services for security purposes. Surveillance videos are not used by the **Warrnambool & District Community Hospice** for other purposes and the footage is not publicly available. Surveillance cameras are not located in any bathrooms or change room facilities.

Job applicants, staff members and contractors:

In relation to personal information of job applicants, staff members and contractors, **Warrnambool & District Community Hospice's** primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.

The purposes for which the **Warrnambool & District Community Hospice** uses personal information of job applicants, staff members and contractors include:

- for insurance purposes;
- to satisfy **Warrnambool & District Community Hospice's** legal obligations,

Where **Warrnambool & District Community Hospice** receives unsolicited job applications these will usually be dealt with in accordance with the unsolicited personal information requirements of the Privacy Act.



Volunteers:

Warrnambool & District Community Hospice also obtains personal information about volunteers who assist **Warrnambool & District Community Hospice** in its functions or conduct associated activities, such as to enable **Warrnambool & District Community Hospice** and the volunteers to work together.

Who might Warrnambool & District Community Hospice disclose personal information to?

Warrnambool & District Community Hospice may disclose personal information, including sensitive information, held about an individual to:

- our employees, volunteers, contractors or service providers solely for the purposes of operation of our website or our business, fulfilling requests by you, and to otherwise provide services to you including, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants;
- any organisation for any authorised purpose with your express consent.

We require these people and organisations to comply with privacy law and not disclose this information to third parties for any other purposes.

Sending information overseas:

Warrnambool & District Community Hospice will not send personal information about an individual outside Australia without obtaining the consent of the individual (in some cases this consent will be implied); or otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

How does Warrnambool & District Community Hospice treat sensitive information?

In referring to 'sensitive information', **Warrnambool & District Community Hospice** means:

"information relating to a person's racial ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual orientation or criminal record, that is also personal information; and health information about an individual".

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

Marketing & Fundraising

Marketing and fundraising activities are essential to the growth and development of Warrnambool & District Community Hospice and its organisational sustainability. We may request permission to send you communications and information about our services and activities that may be of interest to you. These communications may be sent in various forms, including mail, SMS, 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 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.

We do not provide your personal information to other organisations for the purposes of direct marketing.

Management and security of personal information

Warrnambool & District Community Hospice's staff and volunteers are required to respect the confidentiality of personal information and the privacy of individuals.

Warrnambool & District Community Hospice has in place steps to protect the personal information the **Warrnambool & District Community Hospice** holds from misuse, loss, unauthorised access, modification, interference or disclosure by use of various methods including locked storage of paper records and passworded access rights to computerised records.

We have a data breach response plan, which we would follow in the unlikely event of a privacy or data breach.

When you use our website, having your cookies enabled will allow us to maintain the continuity of your browsing session and remember your details when you return. We may also use web beacons, Flash local stored objects and JavaScript. If you adjust your browser settings to block, reject or delete these functions, the webpage may not function in an optimal manner. We may also collect information about your IP address, although this may not identify you.

Updating personal information

Warrnambool & District Community Hospice endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. A person may seek to update their personal information held by the **Warrnambool & District Community Hospice** by contacting the Manager of **Warrnambool & District Community Hospice** at any time.

The Australian Privacy Principles and the Health Privacy Principles require **Warrnambool & District Community Hospice** not to store personal information longer than necessary. In particular, the Health Privacy Principles impose certain obligations about the length of time health records must be stored.

You have the right to check what personal information **Warrnambool & District Community Hospice** holds about you. Under the Commonwealth Privacy Act and the Health Records Act, an individual has the right to obtain access to any personal information which **Warrnambool & District Community Hospice** holds about them and to advise **Warrnambool & District Community Hospice** of any perceived inaccuracy. There are some exceptions to this right set out in the applicable legislation. To make a request to access any information the **Warrnambool & District Community Hospice** holds about you, please contact the Manager in writing.

Warrnambool & District Community Hospice may require you to verify your identity and specify what information you require. Although no fee will be charged for accessing your personal information or making a correction, **Warrnambool & District Community Hospice** may charge a fee to retrieve and copy any material. If the information sought is extensive, the **Warrnambool & District Community Hospice** will advise the likely cost in advance.

How long will Warrnambool & District Community Hospice keep my information?

Under our destruction and de-identification policies, your personal information that is no longer required will be de-identified or destroyed. In many circumstances, however it will be kept for marketing purposes, as you will have consented to that in writing with us.



Enquiries and privacy complaints

If you would like further information about the way **Warrnambool & District Community Hospice** manages the personal information it holds, please contact the Manager. If you have any concerns, complaints or you think there has been a breach of privacy, then also please contact the Manager who will first deal with you usually over the phone. If we then have not dealt satisfactorily with your concerns we will meet with you to discuss further. If you are not satisfied with our response to your complaint within 30 days from this meeting, then you can refer your complaint to the Office of the Australian Information Commissioner via:

email: enquiries@oaic.gov.au tel: 1300 363 992 fax: +61 2 9284 9666