

## Policy Details

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## Purpose

The purpose of this policy is to describe how Rise manages the information about individuals which the organisation collects in the course of providing its services.

## Definitions

Staff: Denotes employees and volunteers.

## Policy

The framework of the Rise Privacy Policy is determined by the Australian Privacy Principles (APP) as contained in the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth).

This Privacy Policy seeks to explain how Rise (or we) collect, use, disclose and otherwise handle personal information. It also seeks to explain how you can ask to access and correct the personal information we hold about you or complain about any suspected privacy breach.

We may also provide individuals with privacy notices in relation to collections of personal information. If there is any inconsistency between these privacy notices and this Privacy Policy, you should rely on the information in the privacy notices.

This Privacy Policy is divided into the following sections:

- A. What personal information do we collect?
- B. How do we collect personal information?
- C. Can you deal with us without identifying yourself?
- D. For what purposes do we collect, hold, use, and disclose personal information?
- E. Do we use your personal information for direct marketing?
- F. To whom do we disclose personal information?
- G. Disclosure overseas
- H. How do we hold personal information and keep it secure?
- I. How can you access and correct your personal information?
- J. How can you make a privacy complaint?
- K. How can you contact us?

### A. What personal information do we collect?

#### Clients (including people applying to be a Rise client)

If you are one of our clients, we may collect the following kinds of personal information about you:

- your name, date of birth and gender
- contact information
- credit/debit card information or banking details
- health information

- other information connected with your history or relationship with Rise, and the services we provide.

If you apply for membership fee reduction, we may also collect information about your income bracket and whether you are retired.

### Staff

If you are one of our staff, we may collect the following kinds of personal information about you:

- your name, date of birth and gender
- contact information
- banking and superannuation fund details
- health information
- previous employment information
- other information connected with your history or relationship with Rise, and the services we provide.

### Others (including agency staff, suppliers, service providers and donors)

If you are connected to our operations and activities in ways other than as a client or staff member, we may collect the following kinds of personal information about you:

- your name, date of birth and gender
- contact information
- banking details
- health information
- other information connected with your history or relationship with Rise, and the services we provide.

## B. How do we collect personal information?

Rise collect personal information in a number of different ways, including through application and enrolment forms; through service agreement documents; by email; telephone; letters; and surveys.

We also collect personal information through our website or digital channels when an individual completes an online form.

Our website also collects other information which may or may not be personal information. For each visitor to our website, our server automatically recognises and stores your 'address' (e.g. your domain name or Internet protocol address), the type of your Internet browser, and the address of the site which 'referred' you to our website, and clickstream data.

In addition, our website uses cookies to track usage of our website. Most web browsers are set by default to accept cookies. However, if you do not wish to receive any cookies you may set your browser to either prompt or refuse cookies. Please note that rejecting cookies may mean that not all the functions on the website are available to you. We use cookies for tracking the statistics of our website. This allows us to better understand our users and improve the layout and functionality of our website.

This tracking is conducted in such a way to ensure the anonymity of visitors. In this context the cookie may identify your computer but it does not identify you.

Sometimes our website contains links to third party websites, for your convenience and information. When you access a non-Rise website, please understand that Rise is not responsible for the privacy or security practices of that site, which are not covered by this Privacy Policy.

We suggest that you review the privacy policies of each site you visit, before supplying any personal information to them.

## C. Can you deal with us without identifying yourself?

Rise's policy is to provide individuals with the option of not identifying themselves, or of using a pseudonym, when dealing with us if it is lawful and practicable to do so.

A pseudonym is a name or other descriptor that is different to an individual's actual name.

For example, you can access our website and make general phone queries without having to identify yourself and you can respond to our surveys anonymously.

In some cases, however, without your personal information, we may not be able to respond to your request or provide you with the product or service you are seeking.

### **D. For what purposes do we collect, hold, use and disclose personal information?**

We collect, hold, use, and disclose (together handle) the personal information outlined above to (one or more may apply):

- provide you with our support services
- identify which of our services will best meet your requirements
- internally analyse client demographics and trends
- evaluate and report on these services
- improve our services
- manage our relationship with you
- communicate with you effectively
- market our services and events, seek donations and recruit volunteers
- comply with relevant laws.

In addition, where we handle personal information for a specific other purpose not outlined above, we will provide a notice at the time of collection which explains the primary purpose and any other related purposes.

### **E. Do we use your personal information for direct marketing?**

We may use your contact details, to let you know about our services, facilities, and benefits.

We may contact you for direct marketing purposes in a variety of ways, including by mail, email, SMS, telephone, online advertising, or facsimile.

You can opt out of receiving marketing communications from us at any time, by contacting Rise on the details in the section titled 'How can you contact us' and making a request to not receive direct marketing.

All direct marketing from Rise will include a prominent statement advising that you can request to no longer receive direct marketing and how to do this.

### **F. To whom do we disclose personal information?**

With your consent, Rise may share your personal information with other organisations to assist us in providing services to you. These may include doctors and health care professionals, other service providers, emergency services and health or aged care assessment bodies. Where relevant, we may also share information with your representative, for example a carer or guardian.

Rise may disclose personal information to funding bodies for the ongoing funding and accreditation of our services.

We take photos at our events to share the experience via our digital channels and print publications. At these events, you may be filmed, recorded or photographed and such recordings and images are

used for promotional and archiving purposes. They may be published in media including online and may include the names of clients, staff and others.

We may also disclose personal information about you to our service providers, such as technology providers, auditors and bankers to assist us in providing services. We take steps to ensure that those providers:

- comply with the Australian Privacy Principles when they handle your personal information, and
- are authorised only to use personal information in order to provide the services or to perform the functions required by Rise.

Rise may also disclose personal information where required or authorised by law.

Due to any government declared emergencies we may disclose additional personal information that we collect about you, such as your phone number and email address, to the relevant health authorities so they can perform contact tracing in the event of a health incident.

Rise does not sell or rent personal information to third parties.

### **G. Disclosure overseas**

In the event that Rise has a need to disclose personal information to an overseas recipient, Rise will take reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to that information.

### **H. How do we hold personal information and keep it secure?**

Rise holds personal information in several ways, including in electronic databases, email contact lists, and in paper files (locked away where appropriate).

Paper files may also be archived in boxes and stored offsite in secure facilities.

Rise takes steps to secure the personal information we hold including the use of Information and Communications Technology (ICT) security (using encryption, firewalls, anti-virus software and login and password protection), secure office access, personnel security and training and workplace policies.

Rise only permits your details to be accessed by authorised personnel, and it is a condition of employment that Rise's employees maintain the confidentiality of personal information.

We may use third-party providers to store personal information electronically. We take reasonable steps to ensure this information is held as securely as information stored on own equipment.

Payment security of all financial transactions is maintained by Rise using EFTPOS and online technologies. It is our policy to ensure that all financial transactions processed, meet industry security standards that ensure payment details are protected.

Unfortunately, we cannot remove all risks involved in sending information through any channel over the Internet. You send information over the Internet entirely at your own risk.

If you are concerned about sending your information over the internet, you can contact Rise by mail or telephone.

Rise will take reasonable steps to destroy or de-identify personal information it no longer requires for an authorised purpose unless:

- the personal information is contained in a Commonwealth record, or
- we are required by or under an Australian law or a court/tribunal order to retain the information.

### **Accidental or unauthorised use or disclosure**

In the event of accidental or unauthorised use or disclosure of personal information, we shall take prompt action to remedy such breach and shall notify the individual and the Privacy Commissioner as required under the Privacy Act.

Relevant staff are trained in dealing with data breaches in line with the government guidelines as linked <https://www.oaic.gov.au/privacy/notifiable-data-breaches>

External service providers contracted by Rise are also bound to comply with the requirements of the Privacy Act in relation to notification of data breaches.

### **I. How can you access and correct your personal information?**

Under the Privacy Act, you have a right to seek access to, and correction of, personal information which Rise holds about you.

#### **Access**

If you wish to exercise your right under the Privacy Act to seek access to the personal information that Rise holds about you, we ask that you contact us (details in the section below titled 'How can you contact us?'), and we will explain how Rise will handle your access request.

We will assume (unless you tell us otherwise) that your request relates to our current records about you. These current records will include personal information about you which is included in our databases and in paper files, and which may be used by Rise on a day to day basis. To provide you with access to 'current' personal information, Rise would ordinarily provide you with a print-out of the relevant personal information from our databases, or with photocopies of records which are held only on paper files. If you request access in a different manner, we will give you access in this manner if it is reasonable and practicable for us to do so. Ordinarily, Rise will not charge you for the cost of providing this type of access to these records.

For legal and administrative reasons, Rise may also store records containing personal information in its archives. You may seek access to the records held by Rise which are not current records, but if you do so, we may charge you for the cost of providing access (but not for the making of the request).

Rise will not give an individual access to their personal information if:

- Rise has reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to Rise's functions or activities has been, is being or may be engaged in, and
- giving access would be likely to prejudice the taking of appropriate action in relation to the matter.

If Rise declines to give an individual access to their information, Rise will provide written reasons for the refusal and advice on the mechanisms available to complain about the refusal.

Requests from employees for access to their employee records will be considered on the merits of the case. Rise may refuse to make available to an employee some records pertaining to their employment. The Privacy Act exempts employee records from the Act in respect of current or former employee records.

#### **Correction**

If you are of the view that personal information about you is inaccurate, out-of-date, incomplete, irrelevant or misleading, please provide us with your request for correction (contact details are set out in the section below titled 'How can you contact us?').

Rise's policy is to consider any requests for correction in a timely way.

If Rise refuses an individual's correction request, Rise will provide the individual with written reasons for the refusal.

### J. How can you make a privacy complaint?

If you wish to complain about how we have handled your personal information, please contact Rise on the contact details set out below. We will respond to your complaint as soon as reasonably practicable. If you are not satisfied with our response to your complaint, you may also contact the Office of the Australian Information Commissioner.

### K. How can you contact us?

If you have any questions or comments about this Privacy Policy please contact Rise:

- by telephone: 08 6274 3700, or
- by e-mail: [contact@risenetwork.com.au](mailto:contact@risenetwork.com.au), or
- by letter: Rise, 41A Great Northern Highway, Middle Swan, WA 6056, or
- by website: [www.risenetwork.com.au](http://www.risenetwork.com.au)

Internal breaching of this policy may lead to the application of the Performance Management Policy.

#### Procedure

N/A

#### Cross reference to relevant policy

[Protection of Intellectual Property](#)

#### Forms pertaining to this policy are/location

[Confidentiality and Intellectual Property Agreement](#)