

## Purpose and Scope

Cahoots is bound by the Australian Privacy Principles (APP) of the *Privacy Act 1988* and is committed to protecting the personal information held in respect of any of Cahoot's staff and external contacts in accordance with the requirements of those Principles.

This Privacy Policy sets out our commitment to protecting the privacy of personal information provided to us, or otherwise collected by us, offline or online, including through our website and other applications. In this Privacy Policy.

This policy applies to all staff, volunteers and participants.

The Operations Manager is responsible for implementation of this policy.

## POLICY STATEMENT

### Personal information

The amount and type of personal information we collect from people will vary depending on their association with Cahoots as a participant, parent, carer, nominated representative, employee, volunteer, supporter, corporate partner or another stakeholder.

The types of personal information we may collect about you include:

- name, address, telephone, and email contact details
- gender and date of birth; information about disability and support needs
- information about health and medical conditions
- identifiers used by Government agencies or other organisations to identify individuals such as Medicare and tax file numbers
- information about the services a person is funded to receive, whether under the National Disability Insurance Scheme or otherwise and their current supports
- information about qualifications, training and work history
- information from NDIS Worker Screening, Working with Children Checks, and the right to work in Australia
- visual images, via photograph or otherwise
- personal likes and dislikes, preferences and/or opinions
- information provided through customer surveys
- tracking the use of services and enquiries
- browser session and geo-location data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour
- additional personal information provided to us, directly or indirectly, through the use of our Site, associated applications, associated social media platforms and/or accounts from which the collection of information is permitted
- billing details any other details you provide to us as part of a payment or donation process via the website
- any other personal information requested by us and/or provided by you or a third party.

We may collect these types of personal information directly from you or from third parties.

We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about persons using our services or how users use our website.

## How we collect personal information

We may collect personal information in a range of ways including:

- when inquiries are made about services or supports
- when applications are made for services or supports
- when applications to become a member, supporter, employee or volunteer of Cahoots are made
- when contact is made in person, by phone, via mail, email or online through the access and use of our website (or when we make contact through any means)
- when services and supports are received from us
- when donations are made to us or participation in any of our fundraising activities occurs
- through our direct marketing activities

Where possible, we will collect personal information directly or from a nominated representative. However, there may be circumstances in which we need to collect information from other people or organisations.

If we collect personal information from a third party and it is unclear that there is consent to the disclosure of personal information to us, we will take reasonable steps to make contact and ensure the circumstances surrounding the collection and purposes for which we have collected your personal information is understood.

If personal information is withheld following a reasonable request, we may be unable to provide the requested information, services or supports.

## Collection and use of personal information

We may collect, hold, use and disclose personal information for the following purposes:

- to enable access and use our Site, associated applications and associated social media platforms
- to enable contact and communication
- to provide information about our organisation, services and supports
- to develop a customer/participant profile for service delivery
- for internal record keeping and administrative purposes, including training, accounting, audit and information technology
- for analytics, market research and business development, including to operate and improve our Site, associated applications and associated social media platforms
- to encourage further involvement with Cahoots, run competitions and/or offer additional benefits
- for advertising and marketing, including sending promotional information about our products and services and information about third parties that we consider may be of interest
- to comply with our legal obligations, meet funding and government reporting requirements and Cahoots corporate governance requirements
- to resolve complaints or disputes
- to conduct quality assurance activities and enable third parties, such as the National Disability Insurance Agency, to conduct audits
- to consider employment or volunteer applications

## Disclosure of personal information to third parties

In order to carry out our activities and provide our services and supports, we may be required to disclose personal information to third parties. We may disclose personal information to:

- third party service providers for the purpose of enabling them to provide their services, including (without limitation) IT service providers, data storage, webhosting and server providers, debt collectors, maintenance or problem-solving providers, marketing or advertising providers, professional advisors, and payment systems operators.
- our employees, contractors and/or related entities.
- our existing or potential agents or business partners.
- government and regulatory bodies, including the National Disability Insurance Agency, the Department of Communities, the Department of Health, and the Australian Taxation Office.
- where disclosure is required by law, including where required to the police, to the NDIS Quality and Safeguards Commission, the Department of Communities or to comply with compulsory notices from courts of law, tribunals, or government agencies

- sponsors or promoters of any competition we run.
- anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred.
- credit reporting agencies, courts, tribunals and regulatory authorities, in the event you fail to pay for goods or services we have provided to you.
- lawyers, auditors, banks and other advisors appointed by us or acting on our behalf.
- courts, tribunals, regulatory authorities, and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or to establish, exercise or defend our legal rights; [and]
- third parties, including agents or sub-contractors, who assist us in providing information, products, services, or direct marketing to you. This may include parties located, or that store data, outside of Australia.
- third parties to collect and process data, such as Google Analytics or other relevant businesses. This may include parties that store data outside of Australia;

By providing us with personal information, you consent to the disclosure of your personal information to third parties who reside outside Australia and acknowledge that we are not required to ensure that those third parties comply with Australian privacy laws. Where we disclose your personal information to third parties, we will request that the third party handle your personal information in accordance with this Privacy Policy.

### How we treat personal information that is also sensitive information

Sensitive information is a subset of personal information that is given a higher level of protection under the Australian Privacy Principles. *Sensitive information* means information relating to your racial or ethnic origin, political opinions, religion, trade union or other professional associations or memberships, philosophical beliefs, sexual orientation or practices, criminal records, health information or biometric information. Your rights and controlling your personal information

**Choice and consent:** Please read this Privacy Policy carefully. By providing personal information to us, you consent to us collecting, holding, using and disclosing your personal information in accordance with this Privacy Policy. You do not have to provide personal information to us, however, if you do not, it may affect your ability to access services provided by us.

**Information from third parties:** If we receive personal information about you from a third party, we will protect it as set out in this Privacy Policy. If you are a third party providing personal information about somebody else, then you need to tell that other person that you have done so, that they have a right to access their information and that they can refer to the Privacy Policy for information on how Cahoots will handle their personal information.

**Restrict:** You may choose to restrict the collection or use of your personal information. If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by contacting us using the details below.

**Access:** You may request details of the personal information that we hold about you. An administrative fee may be payable for the provision of such information. In certain circumstances, as set out in the *Privacy Act 1988*, we may refuse to provide you with personal information that we hold about you.

**Correction:** If you believe that any information, we hold about you is inaccurate, out of date, incomplete, irrelevant, or misleading, please contact us using the details below. We will take reasonable steps to correct any information found to be inaccurate, incomplete, misleading, or out of date.

**Complaints:** If you believe that we have breached the Australian Privacy Principles and wish to make a complaint, please contact us using the details below and provide us with full details of the alleged breach. We will promptly investigate your complaint and respond to you, in writing, setting out the outcome of our investigation and the steps we will take to deal with your complaint.

**Unsubscribe:** To unsubscribe from our e-mail database or opt-out of communications (including marketing communications), please contact us using the details below or opt-out using the opt-out facilities provided in the communication.

### **Storage and security**

We are committed to ensuring that the personal information we collect is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic, and managerial procedures to safeguard and secure the personal information and protect it from misuse, interference, loss and unauthorised access, modification, and disclosure.

We cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that the personal information we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

### **Cookies and web beacons**

We may use cookies on our Site from time to time. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your email address or other personally identifiable information. However, they do allow third parties, such as Google and Facebook, to cause our advertisements to appear on your social media and online media feeds as part of our retargeting campaigns. If and when you choose to provide our Site with personal information, this information may be linked to the data stored in the cookie.

We may use web beacons on our Site from time to time. Web beacons (also known as Clear GIFs) are small pieces of code placed on a web page to monitor the visitor's behaviour and collect data about the visitor's viewing of a web page. For example, web beacons can be used to count the users who visit a web page or to deliver a cookie to the browser of a visitor viewing that page.

### **Links to other websites**

Our Site may contain links to other websites. We do not have any control over those websites, and we are not responsible for the protection and privacy of any personal information which you provide whilst visiting those websites. Those websites are not governed by this Privacy Policy.

### **Amendments**

We may, at any time and at our discretion, vary this Privacy Policy by publishing the amended Privacy Policy on our Site. We recommend you check our Site regularly to ensure you are aware of our current Privacy Policy.

### **Communication**

This policy will be communicated in an appropriate way to:

- Participants and their support networks through Cahoots e-newsletter, website, intake process, easy to read flyers and accessible on request.
- Staff and volunteers through inductions, professional development and staff meetings.

### **Policy Review**

This policy will be reviewed every two years in consultation with participants and their support networks together with staff and volunteers.

This policy is not intended to be a static document and Cahoots commits to its ongoing development as part of continuous quality improvement, and as policy and legislation changes dictate.

### **Reference and Related Documents**

- Privacy Act 1988 No. 119, 1988 as amended
- Australian Privacy Principles
- Australian Human Rights Commission
- Disability Discrimination Act 1992
- Freedom of Information Act 1982
- National Disability Insurance Scheme Act 2013
- NDIS Quality and Safeguards Commission

- NDIS Practice Standards and Quality Indicators
- Safeguarding Children and Adults at Risk Policy
- Communications and Social Media Policy

## Versions

No.	Approval Date	Description of Amendment
1.0	30/11/16	Policy created – due for review November 2018
2.0	01/06/2018	Reviewed to align with new privacy data legislation
3.0	25/02/2020	Reviewed
4.0	19/11/2021	Reviewed
5.0	11/04/2022	Reviewed DB and TB
6.0	12/04/2024	Reviewed
7.0	01/04/2026	Reviewed

Owner	Approver	Next Review
Operations Manager	CEO	1 April 2028