Growth Advance Techniques Pty Ltd Privacy Policy

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2020

**Policy No. 1**

**Summerhouse Privacy Policy**

1. **Policy Outline**

**The requirement of this policy is to:**

**1.1** To clarify the exchange of communication between Growth Advance Techniques Pty Ltd and every individual involved.

**1.2** Stay open to public functioning

**1.3** Give individuals a clear and concise understanding of the ways communication and information is being confidentially dealt with and the procedural management processes on how Growth Advance Techniques Pty Ltd deals with it.

**1.4** The Policy provides the public information about how Growth Advance Techniques Pty Ltd collect, use, disclose and store your personal information.

**2.0 Scope**

**2.1** This Policy applies to all employees of Growth Advance Techniques Pty Ltd. A reference to “employees” or “staff” includes permanent, fixed-term, temporary and casual employees, directors, contractors, volunteers and other representatives acting on behalf of Growth Advance Techniques Pty Ltd in any capacity This Policy applies to all members of the public in association with Growth Advance Techniques Pty Ltd

**2.2** Growth Advance Techniques Pty Ltd respects the privacy of all members, employees, volunteers, clients, beneficiaries, donors, business partners and online users, and is committed to safeguarding the personal information provided to us.

**2.3.** Growth Advance Techniques Pty Ltd is an organization with a mission to ADD MISSION STATEMENT HERE...... In carrying out this mission Growth Advance Techniques Pty Ltd works with employees and volunteers, and receives fees for services provided, donations, funding and support from members of the community, corporations, groups and governments in providing all services.

**2.4** Growth Advance Techniques Pty Ltd complies with national and relevant state privacy principles and any additional obligations under the service agreement or funding contract.

**2.5** This Privacy Policy sets out how we comply with our obligations under the *Privacy Act 1988*(Privacy Act). We are bound by the Australian Privacy Principles (APPs) in the Privacy Act which regulate how organizations may collect, use, disclose and store personal information, and how individuals may access, and correct personal information held about them.

**2.6**  Growth Advance Techniques Pty Ltd respects religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices or criminal record or health, genetic, biometric information or biometric templates, that is also personal information.

**2.7** The collection of information and its nature and extent of personal and sensitive information collected by Growth Advance Techniques Pty Ltd can be obtained by several different collection strategies. Growth Advance Techniques Pty Ltd collects personal and sensitive information from clients, beneficiaries, donors, business partners, employees and online users. Further information about the kind of information collected from each of these groups and the usage of such information is detailed below.

**3.0 Growth Advance Techniques Pty Ltd Clients and Beneficiaries**

**3.1 Kind of information collected:**

* contact details (name, address, email etc.);
* personal details including: date of birth, gender, income;
* information on personal issues and experiences, relationships;
* family background, supports clients may have in the community;
* areas of interest;
* health information and/or medical history;
* credit card numbers or bank account details.

**32. How the information is collected:**

* membership application;
* registration, including online registration;
* enrollment documentation;
* telephone conversation;
* correspondence;
* in-person / meeting.

**3.3 Purpose for use of information:**

* to provide AQ services;
* to provide clients/beneficiaries with the most appropriate services for their needs;
* to meet any requirements of government funding for programs;
* to monitor and evaluate existing services and plan for future services;
* to produce annual reports and for research purposes which may involve contracted organizations;
* to comply with legal obligations.

**4.0 Donors**

**4.1 Kind of information collected:**

* contact details (name, address, telephone numbers, email etc.);
* personal details including date of birth, gender, income;
* areas of interest;
* donation history;
* credit card numbers or bank account details of all our donors;
* expiration date of credit card.

**4.2 How the information is collected:**

* communications, email, flyers;
* online registration;
* telephone – call center;

**4.3 Purpose for use of information:**

To provide Growth Advance Techniques Pty Ltd to;

* process donations and provide accurate receipts;
* to facilitate on-going fundraising and marketing activities;
* to comply with legal obligations;
* to provide transparency relating to donated funds, particularly for appeals for public donations.

**5.0 Business Partners**

**5.1 Type of information collected:**

* contact person's name;
* the name of the organization which employs the person, telephone numbers, fax number, street and postal address, email address and position title;
* areas of interest by category and industry;
* bank details
* Australian Business Number (ABN);
* type of support (e.g. workplace giving, goods in kind, program support, volunteering).

**5.2 How the information is collected:**

* communications, email, flyers;
* online registration;
* telephone.

**5.3 Purpose for use of information:**

* to process donations and provide accurate receipts;
* to pay for services;
* to establish and manage partnerships;
* to receive services from you or the organization which employs you;
* to manage Growth Advance Techniques Pty Ltd relationship with the business partner;
* to provide information about Growth Advance Techniques Pty Ltd services;
* to update the company on Growth Advance Techniques Pty Ltd appeals for public donations, programs and services.

**6.0 Growth Advance Techniques Pty Ltd community**

**6.1** Growth Advance Techniques Pty Ltd Community includes employees and prospective employees, delegates, volunteers and candidates for volunteer work.

**6.2 Type of information collected:**

* contact details (name, address, telephone numbers, email etc.);
* personal details including personal details of emergency contact person(s);
* date of birth;
* country of birth, citizenship, residency and/or visa details;
* details of current/previous employment or volunteer involvement
* skills and experience;
* languages spoken and written;
* Printed and downloaded versions of this document are not controlled
Date of Issue – October 2018 Next Review Date - March 2020 Page 3 of 9
* qualifications, driver’s license details;
* information and opinions from referees for prospective employees / candidates for volunteer work;

**6.3** A Working with Children Check (Blue Card) and Criminal Screening Check (Yellow Card) may be required for volunteer and paid positions at Growth Advance Techniques Pty Ltd. Individuals will be required to provide certain information to apply for these cards in accordance with relevant state and territory laws.

**6.4** In some situations, it is necessary for Growth Advance Techniques Pty Ltd to collect or receive information about an individual's health. In this circumstance, Growth Advance Techniques Pty Ltd will advise why the information is being collected and whether and to whom it will be released.

**6.5 Purpose for use of information**:

* to process an application to become a member, volunteer or employee of our organization;
* to facilitate a placement in an appropriate service or position;
* to assist with services whilst an individual is employed or engaged as a volunteer
* to provide feedback on performance as a volunteer or employee;
* to meet legislative responsibilities to all volunteers and employees;
* to obtain feedback from individuals about their experiences;
* to assist us to review and improve its programs and services to keep individuals informed about Growth Advance Techniques Pty Ltd developments and opportunities;
* to provide information about services;
* to facilitate further involvements with Growth Advance Techniques Pty Ltd (e.g. disability supports, membership, donor).

**7.0 Growth Advance Techniques Pty Ltd Members**

**7.1 Type of information collected:**

* contact details (name, address, telephone numbers, email etc.);
* date of birth;
* credit card details;
* expiration date of credit card;
* areas of interest.
Purpose for which AQ uses the information:

**7.2 To provide Growth Advance Techniques Pty Ltd with;**

* to provide communication updates and ensure transparency;
* relating to donated funds, particularly appeals for public donations, and operations;
* to process donations and provide accurate receipts;
* to facilitate ongoing fundraising and marketing activities;
* to provide info about Summherhouse;
* to receive invitations to upcoming events and activities;
* to recognize support of Summerhouse.

**8.0 Social Media and Online use**

**8.1** To the extent that this Privacy Policy applies to online privacy issues, it is to be read as forming part of the terms and conditions of use of the Summerhouse social media policy and website.

**8.2 Type of information collected**:

•      contact details (name, address, telephone numbers, email etc.

* credit card number;
* expiration date of credit card;
* non-personal information e.g. visitor navigation and statistics;
* server address, browser type, date and time of visit;
* personal information.

**8.3 Purpose for use of information:**

* to process donations, purchase orders, online bookings, purchases/ transactions (e.g. booking First Aid Health & Safety courses);
* to analyze website usage and make improvements to the website;
* Growth Advance Techniques Pty Ltd does not match the personal information collected with the non-personal information.
* Additional information – refer to social media policy

**9.0 Obtaining and Distribution of Information**

**9.1** Growth Advance Techniques Pty Ltd obtains your personal and sensitive information directly from you. If you do not  feel the information that we are requesting, either on our forms or in our discussions with you, is not information you wish to disclose, please feel free to inform and discuss this with us.

**9.2**In a case by case basis we may also obtain personal information about you from a third-party source.

**9.3**Subject to any exceptions under the Act. Growth Advance Techniques Pty Ltd will take all steps necessary to contact you and ensure you are aware of the purposes for which we are collecting your personal information and the third party to which we may disclose your information.

**9.4**  For the purposes referred to in this Privacy Policy (discussed above under the ‘Collection of Personal and Sensitive Information’), we may also disclose your personal information to other external organizations including:

* Government departments/agencies who provide funding
* Doctors and health care professionals, who assist us to deliver our services;
* Former and Current Employers
* Volunteers, for purposes of reference-checking
* Our professional advisors, including our accountants, auditors and lawyers.

**9.5** Growth Advance Techniques Pty Ltd will not disclose an individual's personal information to a third party unless one of the following applies:

* the individual has provided consent
* the individual would expect us to use or give that information for another purpose
* For lawful conduct or legislative requirement
* Prevention of any threat to somebody’s life, health or safety or to public health or safety
* in the matter of unlawful activity, or misconduct of a serious nature that relates to Growth Advance Techniques Pty Ltd in its entirety
* to assist in locating a missing person
* for a confidential dispute resolution
* to provide a health service
* it is necessary for the management, funding or monitoring of a health service relevant to public health or public safety
* for research or the compilation or analysis of statistics relevant to public health or public safety
* necessary measures for the enforcement of a law conducted by an enforcement body.

**9.6** We will protect your personal information by ensuring the overseas destination has similar protections and privacy laws or when entering into verbal or written agreements with the recipient of your personal information to safeguard your privacy.

**10.0 Health Information**

**10.1**Upon obtaining information via a third party, Growth Advance Techniques Pty Ltd will advise you that details have been presented and collected for use. Growth Advance Techniques Pty Ltd will advise you how it is to be used.

**10.2** Growth Advance Techniques Pty Ltd will not use your information without verbal or written consent from you, unless your consent is obtained in accordance with law and legislative requirements.

**11.0 Secure Handling of Sensitive Information**

**11.1**Growth Advance Techniques Pty Ltd takes all necessary steps to protect the personal and sensitive information we hold against misuse, interference, loss, unauthorized access, modification and disclosure of your personal information.

**11.2** Inclusive steps taken by Growth Advance Techniques Pty Ltd are password protection for accessing our Information & Communication Technology (ICT) systems, securing paper files in locked cabinets and physical access restrictions having only authorized personnel being permitted to access this information.

**12.0 Employee Responsibility in Handling Personal Information**

**12.1** If a breach of information or privacy is witnessed, all staff are to report it immediately to the appropriate authority, following Growth Advance Techniques Pty Ltd Procedure for breach of privacy. Furthermore, the relevant authority will ensure the potential breach is reported to the relevant Senior Authority who will determine if an investigation of the breach is required and report externally, including to the Office of the Australian Information Commissioner (OAIC) if/as required. Growth Advance Techniques Pty Ltd will report all Notifiable Data Breaches to any affected individuals and the (OAIC).

**12.2** If a privacy breach occurs, Growth Advance Techniques Pty Ltd will identify any affected individuals and evaluate whether they are likely to experience serious harm.

**12.3**Growth Advance Techniques Pty Ltd will notify the affected individual/s and the OAIC of serious harm inclusive of serious physical, emotional, financial or reputational harm if an investigation is required to be conducted within 90 days.

**12.4 Potential Breaches that may occur are:**

* Providing personal information or a client file without a legitimate reason or purpose.
* Leaving files containing personal information unsecured (this might include leaving a page open on a computer screen)
* Providing passwords to unauthorized persons.
* A Notifiable Data Breach occurs when:
* Unauthorized access to or disclosure of information; or
* information has been lost
* it is reasonably likely to result in 'serious harm' to an individual to whom the information relates.

**13.0 Freedom of Information**

**13.1** When individual requests to access  personal information are made or requests of change of details is made by the individual, Growth Advance Techniques Pty Ltd will  make the changes unless we consider there is suitable reason under the Privacy Act or other Laws and Legislations to withhold the information, or not make the changes.

Requests for access and/or correction should be made to the Human Resources Department and by filling out the request for “Freedom of Information Form”, supplied by Growth Advance Techniques Pty Ltd.  For security reasons, you will be required to put your request in writing and provide proof of your identity including photo ID verification in person.

**13.2** A copy of the requested information will then be mailed to you within 14 days. If you do not receive it within this timeframe, a copy may be printed and handed to you directly ***after***the 14-day period.

**13.3** Growth Advance Techniques Pty Ltd may charge you reasonable fees to reimburse us for costs we incur relating to your request for access to information, including in relation to photocopying and delivery cost of information stored off site. For current fees, please contact the Human Resources Department.

**13.4**If an individual establishes that personal information held about her/him is not accurate, complete or up to date, Growth Advance Techniques Pty Ltd will take reasonable steps to correct our records.

**13.5 Access will be denied if:**

* Verification of the person requesting the required information cannot be verified in accordance with ***(13.1)***
* providing access would pose a serious threat to the life, health or safety of a person or to public health or public safety
* providing access would create an unreasonable impact on the privacy of others named in the information documents.
* the request relates to existing or anticipated legal proceedings
* access would be unlawful.
* denial of access is authorized or required by law
* access would cause harm with law enforcement activities
* any other reason that is provided for in the APP's or in the Privacy Act.
* If we deny access to information, we will set our reasons for denying access.

**13.6** Where there is a dispute about your right of access to information or forms of access, this will be dealt with in accordance with the complaint's procedure.

**13.7** Growth Advance Techniques Pty Ltd will update the Privacy Policy to always be in line with APP standards, Laws and Legislations. Review of this Document will be made annually by members of the Board.

**14.0 In Accordance with the Act**

**14.1** Growth Advance Techniques will abide by all sections of the Health Care Identifiers Act 2010 as per listed below:

**14.2 Healthcare Identifiers Act 2010 No. 72, 2017,** Compilation No. 14 / Compilation date: 1 July 2017 Includes amendments up to: Act No. 59, 2017/ Registered: 18 July 2017

A copy of the Act can be found at: <https://www.legislation.gov.au/Details/C2017C00239>

**Resources:**

**Legislation and Regulations**

*Child Protection Act 1999 (Qld)*
*Disability Services Act 2006 (Qld)*
*Disability Services Regulation 2017 (Qld)*
*Education (Accreditation of Non-State Schools) Act 2017 (Qld) Education (Accreditation of Non-State Schools) Regulation 2017 (Qld)*

*Education (General Provisions) Act 2006 (Qld)*
*Education (General Provisions) Regulation 2017 (Qld)*
*National Disability Insurance Scheme Act 2013 (Cth)*
*Privacy Act 1988 (Cth)*
*Working with Children (Risk Management and Screening) Act 2000 (Qld) Working with Children (Risk Management and Screening) Regulations 2011(Qld)*

**Standards and Principles**

Australian Privacy Principles
Human Services Quality Standards (Dept Communities, Child Safety and Disability Services) National Disability Standards (Cth)

OAIC Notifiable Data Breaches Scheme