

DCA PRIVACY POLICY

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Scope

This policy applies to all DCA employees, DCA Volunteers, DCA Board members and DCA contractors. All people working for DCA are required to be familiar and comply with the obligations set out in this Privacy policy.

Objectives

The objective of this policy is to ensure employees, volunteers, contractors and external interested parties are aware of and understand how Deaf Children Australia (DCA) its subsidiaries and Sign for Work protect the privacy of any personal information it collects, holds and administers.

Overview

Deaf Children Australia (ABN 108 025 207) is committed to protecting personal information and ensuring transparency in how it is collected, used, and disclosed. We use personal information to:

- Deliver and improve services,
- Manage communications,
- Comply with legal obligations, and
- Support fundraising activities.

For details, see Disclosure of Personal Information and Fundraising and Donor Privacy.

We adhere to the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cth). More information can be found at the Office of the Australian Information Commissioner (OAIC): <u>https://www.oaic.gov.au</u>.

Deaf Children Australia's Privacy Officer

The CEO appoints a Privacy Officer responsible for:

- Monitoring compliance with privacy policies.
- Ensuring staff awareness and training.
- Handling access requests and privacy-related complaints.

Privacy-related inquiries can be directed to: Email: privacy@deafchildren.org.au Phone: 03 9539 5300 extension 5

What is personal information and why do we collect it?

When used in this Privacy Policy, the term "personal information" has the meaning given to it in the Privacy Act.

Personal information includes a broad range of information, or an opinion, that could identify an individual. What is personal information will vary, depending on whether a person can be identified or is reasonably identifiable in the circumstances.

For example, personal information may include, but is not limited to:

- an individual's name, signature, address, phone number or date of birth
- sensitive information
- credit information
- employee record information
- photographs
- internet protocol (IP) addresses
- voice print and facial recognition biometrics (because they collect characteristics that make an individual's voice or face unique)
- location information from a mobile device (because it can reveal user activity patterns and habits).

The *Privacy Act 1988- external site* doesn't cover the personal information of someone who has died.

We collect your Personal Information for the primary purpose of providing our services to you, providing information to our clients and marketing. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

When we collect Personal Information, we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

What is sensitive information?

Sensitive information is personal information that includes information or an opinion about an individual's:

- racial or ethnic origin
- political opinions or associations
- religious or philosophical beliefs
- trade union membership or associations
- sexual orientation or practices

- criminal record
- health or genetic information
- some aspects of biometric information.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law.

Third Parties

DCA may receive personal information from referral partners, government agencies, funding bodies, and service providers. We take reasonable steps to ensure third parties comply with privacy laws, contractual obligations, and data security measures.

Disclosure of Personal Information

We may disclose personal information to:

- Third-party service providers assisting with program delivery.
- Government agencies to meet reporting requirements.
- Regulators or law enforcement when required by law.
- Fundraising and donor communications (with consent).

DCA does not sell, rent, or trade personal information. For donor privacy, see Fundraising and Donor Privacy.

Security of Personal Information

DCA ensures personal information is protected from unauthorised access, misuse, modification, or disclosure. Information is stored securely in:

- Physical format: Access-controlled offices.
- Electronic format: Secure, encrypted servers.

When no longer needed, personal information is securely destroyed or de-identified, except where legal retention periods apply.

Access to your Personal Information

You may access or request corrections to your personal information by contacting us at privacy@deafchildren.org.au. Identification may be required before releasing information.

How do we store and secure personal information?

Deaf Children Australia makes every effort to protect your personal information from unauthorised access, improper use, alteration and destruction.

We store personal information in order to ensure that we can manage and maintain communication with individuals and organisations we work with. Deaf Children Australia holds personal information in either:

- a) Hard copy (paper based) format in secure access-controlled offices; or
- b) Electronic format (databases and email files) which requires login and passwords and are stored on our secure servers.

Unauthorised Access, Use or Disclosure of Personal Information.

DCA takes any privacy breach seriously. In the event of a data breach, DCA will follow its Data Breach Response Plan, which includes steps to assess the impact, notify affected individuals where required, and report the incident to the OAIC under the Notifiable Data Breaches (NDB) scheme

Using the Internet

We collect non-identifiable statistical information to improve our services. This includes:

- Internet domain and IP address.
- Browser type and operating system.
- Pages viewed and documents downloaded.
- Referring website (if applicable).

DCA does not track individuals or identify users unless required by law.

Cookies and Tracking Technologies

DCA uses cookies to:

- Improve website functionality.
- Analyse visitor behaviour.
- Provide a better user experience.

You can disable cookies in your browser settings, but some website features may be affected.

Third Party Websites

DCA's website may contain links to external sites. We are not responsible for their privacy practices. We recommend reviewing their privacy policies before providing personal information.

Online Communication and Data Security

When you communicate with DCA online (e.g., via email or website forms), your information is stored in a secure environment. However, please be aware that:

- Internet transmission is not completely secure, and while DCA implements security measures, we cannot guarantee absolute protection.
- If you have privacy concerns, we offer alternative ways to share information, such as mail or telephone

Fundraising and Donor Privacy

DCA is committed to protecting the privacy of our donors and fundraising supporters. We may use donor information to process donations, issue receipts, and send relevant updates about our impact and future opportunities. Donors can opt out of communications at any time. For details on how we handle general personal information, see Disclosure of Personal Information.

- We comply with the Australian Charities and Not-for-profits Commission (ACNC) regulations on ethical fundraising.
- Donor information is used only for processing donations, issuing receipts, and keeping donors informed about our work.
- DCA does not sell, rent, or trade donor personal information.
- Donors can opt out of communications by contacting fundraising@deafchildren.org.au.

Access/correct personal information or make a privacy complaint

If you wish to access or correct your personal information or lodge a privacy-related complaint, please contact our Privacy Officer at:

- Email: privacy@deafchildren.org.au
- Phone: 1300 219 160

Requests are typically responded to within 30 days. If you are not satisfied with how we handle your privacy complaint, you may escalate your concerns to the Office of the Australian Information Commissioner (OAIC) at <u>www.oaic.gov.au</u> or by calling 1300 363 992.

Changes to the Deaf Children Australia Privacy Policy

This Privacy Policy is effective from 07/03/2025 We may change this Privacy Policy from time to time. Any updated versions of this Privacy Policy will be posted on our website.

References

- Commonwealth Privacy Act (1988)
- Australian Privacy Principles (APPs)
- Office of the Australian Information Commissioner (OAIC) What is Personal Information?
- Australian Charities and Not-for-profits Commission (ACNC) Fundraising Guidelines

Related documents

Current DCA Policies and Procedures that are located on SharePoint with particular focus on:

- Quality Policy (POL-CP-00)
- Privacy Policy (easy read) (POL-CP-04a)
- Service Management Policy (POL-CP-08)
- Risk Management Policy (POL-CP-15)
- Code of Conduct Policy (POL-CP-17)
- Equipment and Security Policy (POL-CP-30)
- Cyber Security Policy (POL-CP-33)
- Clear Desk and Clear Screen Policy (POL-CP-35)

- Child Safe Code of Conduct Policy (POL-CP-49)
- Reportable Conduct Policy and Procedure (POL-CP-50)
- Data Breach Response Plan (QP-CP-19)
- Cyber Incident Response Plan (QP-IT-01)