

# CityLife Community Care Privacy Policy

Your privacy is important to us. We are committed to protecting your privacy and to ensure that we uphold your trust. Our Privacy Policy is created in compliance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles. It covers how we collect, use, disclose, and store your information.

## **1. Why we collect your personal information**

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CityLife Community Care (CLCC) is a non-profit organisation providing support to individuals and families, including those who are experiencing crisis, financial need and distress. To participate in certain programs or activities, we need to collect some information from those who want to access our services, enabling us to communicate with them and provide the requested services.

## **2. What personal and sensitive information we collect**

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The information that we collect about you will vary depending on the nature of involvement and the activities that you choose to be involved in. We endeavour to only ask you for information that is reasonably necessary for the activities you are seeking to be involved in. You are not required to provide the personal and/or sensitive information that we request, but if you chose not to provide it, it may hinder or prevent your involvement or inclusion in some activities, communications and the degree of support and care that we can provide you with.

The information that we collect may include:

- contact details (name, address, telephone numbers, email, etc.)
- personal details (birthdate, marital status, gender, etc.)
- family details (spouse, children, etc.)
- education qualifications and occupation information (profession, job title, etc.).

Some personal information is considered 'sensitive information'. At times we collect sensitive information about you, including:

- health information
- religious information (denominational details)
- professional and practice information
- criminal record
- credit card details.

### **2.1 Anonymity and Pseudonymity**

Where practicable and lawful, when requested by you, we will endeavour to provide you with the option of interacting anonymously or by using a pseudonym. However, this may prevent us from practically and effectively communicating with you.

## **2.2 Online privacy**

We are committed to protect your privacy on our websites. All access to our public websites is anonymous, except for any areas where you login with your own account or enter your personal information.

When you visit our public websites a record of your visit is logged and the following data is supplied by your browser:

- The date, time and length of your visit to the website
- Your IP address and/or domain name
- Your operating system (type of browser and platform)
- The pages and resources you accessed and the documents you downloaded.

Cookies are only used to store temporary information about your current visit, and all data stored in them is encrypted.

Our website may contain links to third party websites, and third party websites may also have links to our website.

Our privacy policy does not apply to other websites. The operators of other websites may collect your personal information.

We encourage you to read the privacy policies of any website you link to from our website.

Our staff and some volunteers have access to private sections of our public websites and to private websites such our staff Intranet and databases, which also log the pages and resources that each individual accesses for auditing and security purposes.

## **3. How we collect your information**

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We collect personal information about clients, volunteers, staff, contractors and visitors to our events by:

- any of the forms on our website, other electronic means, or paper forms (contact information form, event registration, etc.)
- face-to-face meetings
- email or social media message or conversation
- phone calls
- voice or image recording
- referrals from external agencies.

We will advise you of the purposes for collecting the information at the point that it is collected, and of any third parties to whom the information is usually disclosed.

### **3.1 Unsolicited collection of personal or sensitive information**

At times we may discover personal or sensitive information about you from a third party. If it is not personal information that is contained in a Commonwealth record, and if it is not necessary for providing a service to you, or we are unable to advise you, we will take steps to destroy or de-identify the information if it is lawful and reasonable to do so.

## **4. Security and holding of your personal information**

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We take all reasonable steps to protect the personal and sensitive information we hold from interference, misuse, loss, unauthorised access, modification or disclosure.

Our IT systems are password protected and comply with applicable security standards. Only authorised personnel are permitted to access your data. Where we use cloud storage, we take all reasonable steps to ensure that the providers we use have privacy policies in place that comply with Australian privacy regulations and principles.

It is our policy to permanently de-identify personal information where reasonable and possible; and destroy personal information once there is no longer a legal or other need for us to retain it.

In the unlikely event of a data breach of information held by CityLife, in compliance with the Data Breach Notification scheme, (Part 111C of the Privacy Act 1988, CityLife will:

- Take immediate steps where possible to contain a suspected or known breach
- Take remedial action where possible to reduce any potential harm to individuals
- Review immediately to consider whether the data breach is likely to result in serious harm to any of the individuals whose information was involved.
- Where it is considered that serious harm is likely to those individuals whose information is involved, the Privacy Commissioner and those individuals involved will be notified in line with the Data Breach Notification scheme
- The incident will then be fully reviewed and action taken to prevent further breaches.

## **5. How we use your information**

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We only use your personal and sensitive information for the reason we collect it as outlined above and for the purpose(s) for which it was collected and for any other purposes that you consent to, or as otherwise reasonably expected or permitted by law.

### **5.1 Direct Marketing**

At times we will use your personal information to directly communicate with you about topics which we think you would be interested in, and be of benefit to you, such as programs, courses and events. These communications will typically be in the form of email or SMS text message. We will always give you the ability to opt-

out of these communications, unless the communication is required for involvement in a specific event, or other area in which you have chosen to participate.

## **6. Accessing your personal information**

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You can gain free access to your personal and sensitive information by requesting it from us. In some circumstances, we may need to deny your access request, for example where:

- granting you access would have an unreasonable impact on someone else's privacy;
- any other reason as consistent with the Privacy Act.

In such a situation we will provide you with an explanation in writing for why access is denied, including information on the process for a complaint regarding the refusal.

## **7. Correcting your personal information**

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We take all reasonable steps to ensure that the personal information we hold and collect is relevant, accurate, complete and up-to-date. We regularly provide clients with the opportunity to update your details. Ask at reception, or through the service provider if this is required.

## **8. Disclosure of your information**

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At times we may make some personal information available to community agencies that work with us to provide services, but only where we have your consent to do so. We also make some personal and sensitive information available to staff, contractors and some key CLCC volunteers, where they have agreed to a confidentiality statement, for them to provide services or manage certain aspects of our agency. This does not reduce our commitment to your privacy. We work with our contractors and volunteers to ensure that your privacy is respected and secured the same as if a staff member was handling it.

Any disclosure of your personal information other than to staff, contractors and key volunteers would only occur if we have your permission, or:

- the disclosure is required or authorised by law or court order; and
- doing so does not breach the Australian Privacy Principles; and
- the recipient of the information is subject to a law or binding scheme that has the effect of protecting the information that is substantially similar to the way in which the Australian Privacy Principles protects the information.

We may sometimes share non-personal, non-sensitive and de-identified information with research organisations.

## 9. Privacy questions and complaints

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If you have any questions or concerns about our Privacy Policy or if you would like to make a complaint about a possible breach of local privacy laws, please contact us using the contact details below.

We read all communications and reply where appropriate as soon as possible. In order to effectively address your complaint, we may request further information from you about it before we address it. If you are not satisfied with our response, you may refer your complaint to the [Australian Information Commissioner \(Oaic\) on http://www.oaic.gov.au/](http://www.oaic.gov.au/).

We may update our Privacy Policy from time to time. When we change the policy in a significant way, we will post a notice on our website along with the updated Privacy Policy.

Privacy Officer  
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