

B018 Privacy Policy Framework

About this privacy policy

At YWCA Australia (ABN 74 111 663 873) and our subsidiary companies, YWCA Housing (ABN 60 133 272 116) and YWCA National Housing (ABN 51 638 037 254) (**YWCA, we, our, us**), we value and respect your privacy and take the protection of your personal information seriously.

We have prepared this privacy policy to inform you of the personal information we collect and hold about you, and how we use that information. This privacy policy also provides information about your privacy rights as an individual and how to contact us if you have any privacy concerns.

We recognise the importance of protecting your privacy and are committed to managing your personal information in accordance with the Australian Privacy Principles and any other contractual obligations YWCA may have with you.

This privacy policy may change from time to time and it is therefore important that you review it regularly.

If you do not agree with any part of this policy, you should not use our website or any associated services.

This policy covers members, volunteers, program participants, supporters, job applicants, members of the public and others who provide personal information to us.

What personal information do we collect and handle?

Personal information is any information or opinion about you that can reasonably identify you or anyone else. This information might be true or not, and it might be recorded in material form or other ways.

The types of personal information we collect and handle may include, but are not limited to:

- contact information, such as your name, postal and/or home address, telephone number and email address;
- gender, sexual orientation, ethnicity, disability status and other demographic data;
- information about your connection to YWCA;
- technical information such as device IDs and IP addresses
- information you provide to us through surveys; and
- if you apply to be a volunteer, employee or a contractor, we might collect information about your qualifications, skills, experience and employment history.

How do we collect your personal information?

We collect personal information through various avenues, including information you provide to us directly, for example:

- when you communicate or interact with us by telephone, email, online (including through our website and our social media channels);
- when you use or participate in our programs and services;
- when you complete a form or a survey, including the YWCA Membership application form; and
- information you provide to us during attendance at our events;

You must only provide us with the personal information of someone else if you have that person's consent to do so.

Information we obtain from other sources

Third parties

We may receive information about you from other sources, including:

- our sponsors;
- our suppliers and other third parties who provide services to us, including secure online donation portals such as Raisely and EverydayHero; and our online course hosted by Thinkific; and
- our social media sites, namely Facebook, Instagram, Twitter and LinkedIn, which may provide us with your username and access to your public profile.

Cookies

To help enhance your experience using the website and improve the services that we provide through our website, certain information is collected from your browser.

We may use cookies and other similar technologies (e.g. flash cookies, etc.) to automatically collect information, measure and analyse which web pages you click on and how you use the website, and provide you with targeted information on the website. A cookie is a small text file that our site may place on your computer as a tool to remember your preferences.

By using the website, you consent to our use of cookies.

You may be able to refuse or disable cookies by adjusting your browser settings. Because each browser is different, please consult the instructions provided by your browser. Please note that you may need to take additional steps to refuse or disable certain types of cookies. Please note that if you disable cookies you may not be able to use the full functionality of our website.

Why do we collect your personal information?

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

- to maintain contact with you to inform you about our work, objectives, programs and activities;
- to manage purchases and donations;
- to manage your relationship with us as a volunteer or member;
- for recruitment and employment purposes;

- for the administration, planning, and development of services and programs;
- to update our records and ensure your contact details are up to date;
- to respond to your comments or questions;
- to process and respond to complaints,
- verifying your identity and information;
- collecting aggregated data, and conducting surveys, about the community;
- to show your name and the amount of any donation or sponsorship you may make on our website (unless you choose a private or anonymous donation);
- for marketing purposes; and
- to comply with applicable laws and regulations.

We may also:

- use your personal information and sensitive information in a de-identified or anonymised form to obtain funding grants and philanthropic support and for research purposes from time to time; and
- combine or share any de-identified or anonymised personal or sensitive information that we collect with information collected by any other YWCAs within Australia. In any other circumstance, we may only share your information with your express consent.

Who might we disclose your personal information to?

In Australia

We may disclose your personal information to various third parties for any of the purposes set out in section 5 above. The types of third parties with whom we exchange personal information include:

- service providers, including providers of campaign, promotion, accounting, auditing, legal, banking, consulting, payment processing, delivery, data processing, data analysis, document management, information broking, research, investigation, recruitment, insurance, superannuation, payroll, training, web hosting, IT systems administration, electronic administration, and technology services;
- other YWCAs and community service providers;
- for people who work with us, or apply to work with us, referees and screening check providers (e.g. for background, identity, eligibility to work, vocational suitability, health and criminal record checks);
- government agencies for reporting and compliance purposes;
- various third party suppliers and partners who provide services and support for our programs and operations, including in relation to our website, for business and marketing purposes;
- your organisation and representatives, if applicable;
- law enforcement agencies and other organisations where required or permitted by law;

We will not disclose your identity to unauthorised persons and we will never sell your personal information or sensitive information under any circumstances.

Overseas

We may disclose your personal information to other YWCAs and third party suppliers located overseas for the purposes set out in section 5 above. We will take reasonable steps to ensure that overseas recipients do not cause us to breach our privacy obligations in respect of your personal information.

We may disclose your personal information to entities located outside of Australia, including the following entities:

- the World YWCA, located in Switzerland, and other YWCAs that offer opportunities to members of Australian YWCAs and other similar organisations; and
- third parties including United States-based service providers SurveyMonkey, Meta, Mailchimp, HubSpot and Humanitix and.

What if we can't collect your personal information?

If you do not provide us with the personal information we need, some or all of the following may occur:

- we may not be able to provide you with our services;
- we may not be able to consider your application to join us as an employee, contractor or volunteer; and
- we may not be able to respond to your requests for information.

Visitors to our website

To help improve the service we provide through our website, certain information is collected from your browser. This information is collected as statistical information and includes the IP address, browser type, language and access times. Our website also uses cookies to track pages visited and information accessed within our website. This information is for statistical reference and site analysis only.

In many cases, the tools used on our website record information in a way that does not identify you as an individual. In other cases, information may be personal information in which case this privacy policy will apply. For example, we collect personal information if you follow us through social media services such as Facebook, LinkedIn, Instagram or Twitter, contact us through our site, submit an application for membership or subscribe to our e-newsletter.

Our website may also use third party website tools from time to time, for example Google Analytics and online survey tools. For more about how Google collects and processes data, please see Google's privacy policy and their information at <https://policies.google.com/technologies/partner-sites>.

Third party websites

Our website may contain links to other websites. Please be aware that we are not responsible for the privacy practices of these external websites. When you go to other websites from our website, we advise you to be aware of and read their privacy policy.

How do we protect your personal information?

We take all reasonable steps to keep personal and de-identified information protected from loss, interference, misuse, or unauthorised access, modification or disclosure. These steps may include access controls, encryption and secure premises. We store personal information in both physical and electronic form. We have implemented a rigorous Cyber Security Policy and Procedures aligned with Essential Eight Standards to protect our systems and information stored on these systems from potential external cyber threats.

You should understand that no transmission of data over the internet or any other public network can be guaranteed to be totally secure.

Please note that information collected by third parties may not have the same security protections as information you submit to us, and we are not responsible for protecting the security of such information.

Direct marketing communications

From time to time we may send you direct marketing communications regarding our services, activities, programs, events and volunteering opportunities. We may contact you by electronic messages (e.g. email), online (e.g. through our website or our social media channels), by mail, and by other means, unless you opt out or we are subject to legal restrictions.

You may opt-out of marketing communications by using the opt-out facilities provided in the marketing communications or by contacting our Privacy Officer using the contact details at the bottom of this policy.

We will not provide your personal information to other organisations for the purposes of direct marketing.

How can you access and correct your personal information?

The accuracy of the personal information we hold and use is important to us. We take reasonable steps to ensure that the personal information we handle is accurate, complete and up-to-date. To help us keep your personal information accurate, please let us know if there are any errors or changes in your personal information.

You have a right under the Privacy Act to request access to your personal information that we hold and to request its correction. You can request access to the personal information we hold about you at any time by contacting our Privacy Officer using the contact details at the bottom of this policy. You may also request the correction of any of the personal information we hold about you. In most cases, we can help you promptly and informally with these requests. In other cases, we may need to verify your identity and ask you to make your request in writing.

From time to time, we may need to reject your request to access or correct the personal information we hold about you, if we believe it to be necessary and if we are not otherwise required to grant access by law. For example, we may refuse access if granting it would interfere with the privacy of others or if it would reveal commercially sensitive business information. We will provide our reasons if we deny your request for access to, or correction of, your personal information. Where we decide not to make a requested correction to your personal

information and you disagree, you may ask us to make a note of your requested correction with the information we hold about you.

We won't charge you for simply making a request to access or correct personal information.

How can you make a privacy complaint?

You may contact our Privacy Officer using the contact details at the bottom of this policy if you have any concerns about how we have handled your personal information. We will respond to let you know who will be handling your matter and when you can expect a further response. We may request additional details from you regarding your concern, and we may need to engage or consult with other parties to investigate and deal with your issue. We will keep records of your request and any resolution. If you are not satisfied with the manner in which we have dealt with your complaint, you may contact the Office of the Australian Information Commissioner.

We will treat your complaint confidentially. An authorised representative will contact you within a reasonable time after receiving your complaint to discuss your concerns and outline the options for resolution. We will endeavour to resolve your complaint in a timely and appropriate manner.

Policy reviews

From time to time, we may review and update this privacy policy. Any updated versions of this privacy policy will be posted on our website. All personal information will be collected and handled by us in accordance with the most recently updated policy.

If you would like to provide us with your comments on this policy, please contact our Privacy Officer using the contact details directly below.

How to contact us

If you have any questions or comments about this privacy policy, please don't hesitate to contact us as follows:

Contact: Privacy Officer
Address: Level 1, 210 Kings Way, South Melbourne VIC 3205
Email: companysec@ywca.org.au
Phone: (03) 9341 8700

Document Control Data	
Privacy Policy	
Responsible Officer	Director, Organisation Capability and People
Accountable Officer	Company Secretary

Application	All employees of YWCA Australia
Supersedes	Not applicable
Associated documents	
Legislation	Privacy and Personal Information Protection Act 1998 (NSW) Information Act 2002 (NT) Information Privacy Act 2009 (Qld) Privacy and Data Protection Act 2014 (Vic) Health Records Act 2001 (Vic) Anti-Discrimination Act 1977 (NSW) Health Records and Information Privacy Act 2002 (NSW) Privacy Act 1988 (Cth) Age Discrimination Act 2004 Disability Discrimination Act 1992 Racial Discrimination Act 1975 Sex Discrimination Act 1984 Sex Discrimination Amendment (Sexual Orientation, Gender Identity and Intersex Status) Act 2013 Fair Work Act 2009

Approval and Amendment history				
Review period – 2 years				
Approval date	Effective from	Version	Amendments	Next review
08/09/19	08/09/19	1.0	Initial policy drafted by Herbert Smith Freehills	2 years
14/10/2021	14/10/2021	2.0	Non-material updates in style	2 years
12/10/2023	12/10/2023	3.0	Consequential amendments to terminology and updates to reflect current and best practice.	2 years