

Privacy Policy

Version date: 13/06/2023

Review Date: 13/06/2026

Approved by: Management Committee



Purpose

This privacy policy applies to the collection, use, disclosure and handling of personal information by Very Special Kids ABN 86 109 832 091 ("VSK", "we", "our" and "us"), including information collected via our website '<https://www.vsk.org.au/>' ("Website").

VSK is committed to protecting the privacy of personal information and complying with all applicable privacy laws (including the *Privacy Act 1988* (Cth), the Privacy (Tax File Number) Rule 2015, the *Privacy and Data Protection Act 2014* (Vic) and the *Health Records Act 2001* (Vic)) (together, 'Privacy Laws') to the extent these laws apply to us.

Definitions

- VSK: Very Special Kids
- Disclosure - means provision of information to external bodies, persons or organisations.
- Privacy - in basic terms is the right of individuals to keep their information from being disclosed. Health information; any personal information about the physical or psychological health of an individual or any personal information collected to provide, or in providing, a health service.
- Confidential Information - any information, however communicated or recorded, relating to the operation and activities of Very Special Kids to which an employee/volunteer/board member/consultant or contractor gains access to during engagement with VSK
- Personal information - information or an opinion about an identified individual or an individual who is reasonably identifiable. For the purpose of this policy, personal information includes health information and sensitive information about an employee, volunteer, donor, family or supporter
- Sensitive information - in addition to health information, includes information about an individual's racial or ethnic origin, religious beliefs or affiliations, sexual orientation or practices, genetic information, biometric information or biometric templates.

Scope

- This policy applies to all staff, contractors, and volunteers
- This policy applies to all services provided to or by VSK; this includes clinical services, and support, administration and fundraising.

Designated Responsibilities

- Policy Approval: Finance Risk & Audit Committee
- Policy Owner: GM Business & Finance
- Review cycle: Every three years

Policy

Collection

1. Types of personal information collected

General

The specific personal information that VSK may collect about you will depend on the nature of your interaction with VSK. Generally, this information may include (but is not limited to):

- a) your name and contact details (such as address, email address and phone numbers);
- b) demographic information (such as your date of birth / age, gender and nationality);
- c) technology information about your use of our Website (such as your internet protocol (IP) address, login information, browser type and version); and
- d) information about your visit to our Website (such as pages you viewed or searched for and page response times).

Family Services

The personal information we collect from you when you engage with our family services is collected to ensure that you and your family receive the best possible care, and in addition to the information described above includes (but may not be limited to):

- a) health information;
- b) racial or ethnic origin; and
- c) religious beliefs.

Donations

If you make a donation to VSK, we may also collect your:

- a) bank account or credit card details; and
- b) certain details about your personal interests, employment status or salary bracket.

Employees, potential employees and volunteers

If you apply to work or volunteer with us, we will also collect certain personal information from you to consider your application and, if you are successful in your application, manage our ongoing relationship with you. Information which we may collect when you apply for a job or volunteer position with us includes (but may not be limited to):

- a) education, work experience, qualifications, employment history and resume;
- b) professional registration details;
- c) relevant health information;
- d) Tax File Number and bank account details; and
- e) employment / volunteering screening results (including reference, background, criminal record and eligibility to work checks, e.g. those provided by CrimCheck, and AHPRA).

Except as described in this section 1, we do not generally collect sensitive information about you (e.g. details of racial or ethnic origin, religious beliefs, health information or membership of a trade union). However, where we do collect your sensitive information, we will only do so in accordance with our obligations under applicable Privacy Laws.

In addition to the types of personal information in this section 1, we may collect personal information as otherwise permitted or required by law.

2. How we collect your personal information

VSK collects personal information from you in a number of different ways, including from (but not limited to):

- a) you directly when you provide it to us in person or over the phone;
- b) where appropriate, your parents, legal guardian(s), carers, treatment team or another organisation;
- c) our Website or when you deal with us online (including through social media);
- d) your representatives, referees, academic institutions, professional and trade associations, law enforcement agencies, your current and previous employers and publicly available sources such as LinkedIn;
- e) other third parties when appropriate (such as payment processing gateways
- f) consumer lists that have been acquired from a reputable data provider to obtain contact details of potential donors for a specific marketing campaign;

- g) publicly available sources and third parties which provide analytics and technology services to us (including via Google Analytics); and
- h) in person, onsite or at events held for the purpose of supporting our work

VSK will only collect personal information about you from another person or organisation with your consent, and it will take reasonable steps to provide notice to you that the information has been collected.

Where VSK receives personal information about you which it did not solicit, but which it could have collected in accordance with this privacy policy, this personal information will be afforded the same privacy protection as solicited personal information.

3. Purposes for collection of personal information

The purposes for which we collect your personal information may include to:

- a) provide to you or your family member, or receive from you, goods or services;
- b) communicate with you about donations, products, services, campaigns and events;
- c) process your donations and issue receipts;
- d) conduct and/or fund research into VSK programs and services, or research into donor attitudes;
- e) process any application you make for employment or volunteering opportunities;
- f) fulfil our administrative purposes and obligations;
- g) report to our third party funders and relevant regulators;
- h) improve and optimise our goods, services, business, Website and associated platforms;
- i) administer our Website and associated platforms and for internal operations;
- j) maintain the safety and security of our Website and associated platforms;
- k) respond to any information requests from you, or to address any queries, issues or complaints you may have;
- l) notify you about changes to our services;
- m) carry out fundraising and marketing activities, where you have consented to this;
- n) conduct audit / quality assurance activities or research (with your consent); and
- o) contact you regarding any of the above (via SMS, email or in any other lawful manner).

Generally, you have no obligation to provide to us any personal information requested by us. However, if you choose to withhold requested personal information, we may not be able to provide you with the products and services requested, issue you tax deductible receipts or allow you to participate in the marketing activities that depend on the collection of that information.

4. Use and disclosure

General

VSK may use or disclose your personal information for the purpose for which it was collected. We may also use and disclose your personal information for a secondary purpose that is related to a purpose for which we collected it, where you would reasonably expect us to use or disclose your personal information for that secondary purpose.

Other instances when we may use and disclose your personal information include where:

- a) VSK or substantially all of its assets (including personal data held by us) are acquired by or otherwise transferred to a third party;
- b) we are obliged to do so to comply with legal obligations;
- c) we need to enforce or apply any of our terms of use and other agreements; or
- d) we need to protect the rights, property, or safety of VSK, our members, or others.

Subject to confidentiality provisions as we deem appropriate, we may also disclose your personal information to third parties, including:

- a) third party funders
- b) analytics and search engine providers;
- c) our professional advisors and agents (such as our accountants, insurers, lawyers and auditors);
- d) our IT systems administrators, data analysts and external service providers who operate our website;
- e) our payment system, donation processing and donor database operators; and
- f) our mailing houses and couriers.

If you post information to public parts of our Website or to our social media pages, you acknowledge that such information (including your personal information) may be available to be viewed by the public. You should use discretion in deciding what information you upload to such sites.

Family Services

We may disclose your personal information to your child's general practitioner.

Employees, prospective employees and volunteers

If you are an employee, prospective employee or volunteer with us, we may disclose your information to:

- a) related entities and HR related service providers; and
- b) any third parties to whom you have directed or permitted us to disclose your personal information (e.g. referees).

5. Anonymity

Where it is lawful and practicable to do so, VSK will offer you the option of interacting with us anonymously or by using a pseudonym. Gifts and other forms of support can be given anonymously. However, if you are a donor, then provisions contained in taxation legislation require VSK to collect your name if you require a tax deductible receipt.

6. Overseas disclosure

At times, we may store or transfer information in systems that may be located offshore – however, where possible we try and use systems that store data in Australia.

7. Storage and security of personal information

We will take reasonable steps to keep any personal information we hold about you secure from misuse, interference and loss, and from unauthorised access, modification or disclosure. All information you provide to us is stored:

- a) on central servers located within VSK's premises;
- b) in relation to physical records, in a secure facility located within VSK's premises or at an off-site storage facility; and
- c) on systems and servers operated by third party providers. Where possible we choose to use providers that host servers and storage in Australia.

VSK will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for any purpose.

Except to the extent liability cannot be excluded due to the operation of statute, we exclude all liability (including in negligence) for the consequences of any unauthorised access to, disclosure of, misuse of or loss or corruption of your personal information. Please notify us immediately if you become aware of any breach of security.

8. Access to, and correction of, your personal information

Under the Privacy Laws you may have a right to request access to or correction of your personal information held by us. If you wish to access, correct or update any personal information (including your communication preferences) we may hold about you, please contact us as set out below in clause 11.

However, we may charge for providing access to this information and we may refuse access or refuse to correct your information where the Privacy Laws allow us to do so. If VSK is unable to grant access or correct information, written reasons for the refusal to correct or access to the information will be provided. If we refuse to correct your information, you may request that a statement detailing the requested correction is associated with the information.

9. Marketing Communications – Opting out or Modifying Your Information

At any time you may opt-out of receiving marketing communications by contacting us or by using opt-out facilities provided in the marketing communications and we will then ensure your name is removed from our mailing list.

10. Complaints process

If you have any concerns or complaints about our collection, use or disclosure of personal information, or if you believe that we have not complied with this Privacy Policy or any applicable Privacy Laws please contact us as set out below in clause 13. When contacting us please provide as much detail as possible in relation to your query, issue or complaint.

We will take any privacy complaint seriously and aim to resolve any issue in a timely and efficient manner. We request that you cooperate with us during this process and provide us with any relevant information that we may need.

If you are not satisfied with the outcome of our assessment of your complaint, you may wish to contact the Office of the Australian Information Commissioner (which is the regulator responsible for privacy in Australia), which you can do via the details below:

Office of the Australian Information Commissioner (OAIC)

Tel: 1300 363 992

Mail: Director of Compliance, Office of the Australian Information Commissioner, GPO Box 5218, Sydney NSW 2001

Website: www.oaic.gov.au

11. Cookies

Our Website uses third-party cookies to help us to identify website traffic and usage of our website by our users. Use of such technologies is an industry standard and provides us with information such as how much time is spent on our website, which links are regularly clicked upon and which types of devices are used to access our website. We do not use this information to identify you or your specific browsing activities.

If you prefer not to receive cookies, you can adjust your Internet browser to refuse cookies or to warn you when cookies are being used. However, our Website may not function properly or optimally if cookies have been turned off.

12. Changes to our privacy policy

This Privacy Policy is up-to-date as at 13 June 2023. We may change this Privacy Policy at our discretion and it will continue to apply, as amended, to your use of our Website or other dealings with us.

13. Contact us

Please direct any questions about this Privacy Policy, any access or correction requests and any other privacy issues to our Privacy Officer at:

Privacy Officer, Very Special Kids
321 Glenferrie Road, Malvern VIC 3144
Email: mail@vsk.org.au
Tel: (03) 9804 6222

Policy effectiveness

Policy effectiveness will be monitored via Privacy Complaints reported annually.

References

- Privacy Act 1988
- Freedom of Information Act 1982
- Health Records Act 2001

Revision History

Version	Change Date	Reference and detail of changes
1	13/06/2023	New policy