

# Privacy Policy

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Manual: Friendlies Foundation

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## Policy Statement

The Friendlies Foundation is committed to the right of privacy and the protection of personal & financial information of individuals/donors.

The Friendlies Foundation protects individual's/donors' privacy in accordance with Commonwealth and State legislation and is bound by 13 Australian Privacy Principles (APP) relating to confidentiality and privacy of information relating to individuals/donors financial or other personal details.

Authorised by The Friendlies Foundation Board of Directors  
Code of Acceptance and Refusal of Donations  
2017

## The 13 Australian Privacy Principles are as follows:

### **APP 1 — Open and transparent management of personal information**

Ensures that APP entities manage personal information in an open and transparent way. This includes having a clearly expressed and up to date APP privacy policy.

### **APP 2 — Anonymity and pseudonymity**

Requires APP entities to give individuals the option of not identifying themselves, or of using a pseudonym. Limited exceptions apply.

### **APP 3 — Collection of solicited personal information**

Outlines when an APP entity can collect personal information that is solicited. It applies higher standards to the collection of 'sensitive' information.

### **APP 4 — Dealing with unsolicited personal information**

Outlines how APP entities must deal with unsolicited personal information.

### **APP 5 — Notification of the collection of personal information**

Outlines when and in what circumstances an APP entity that collects personal information must notify an individual of certain matters.

### **APP 6 — Use or disclosure of personal information**

Outlines the circumstances in which an APP entity may use or disclose personal information that it holds.

### **APP 7 — Direct marketing**

An organisation may only use or disclose personal information for direct marketing purposes if certain conditions are met.

### **APP 8 — Cross-border disclosure of personal information**

Outlines the steps an APP entity must take to protect personal information before it is disclosed overseas.

### **APP 9 — Adoption, use or disclosure of government related identifiers**



Outlines the limited circumstances when an organisation may adopt a government related identifier of an individual as its own identifier, or use or disclose a government related identifier of an individual.

**APP 10 — Quality of personal information**

An APP entity must take reasonable steps to ensure the personal information it collects is accurate, up to date and complete. An entity must also take reasonable steps to ensure the personal information it uses or discloses is accurate, up to date, complete and relevant, having regard to the purpose of the use or disclosure.

**APP 11 — Security of personal information**

An APP entity must take reasonable steps to protect personal information it holds from misuse, interference and loss, and from unauthorised access, modification or disclosure. An entity has obligations to destroy or de-identify personal information in certain circumstances.

**APP 12 — Access to personal information**

Outlines an APP entity's obligations when an individual requests to be given access to personal information held about them by the entity. This includes a requirement to provide access unless a specific exception applies.

**APP 13 — Correction of personal information**

Outlines an APP entity's obligations in relation to correcting the personal information it holds about individuals.

**Policy Outcomes**

This policy explains how The Friendlies Foundation manages the personal and financial information of individuals/donors. It describes the types of information that is collected, held, used and disclosed, the management of information and how an individual can access his/her information.

**Definitions**

**CEO** Chief Executive Officer

**APP** Australian Privacy Principles

**Personal Information**

means information or an opinion (including information or opinion forming a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

**Sensitive Information**

is a subset of personal information. The Friendlies Foundation collects and holds information about an individual including information or an opinion:

- About an individual's expressed wishes regarding future health services.
- About health services provided, or to be provided, to the individual.
- Collected in connection with the donation or intended donation by way of money, property, wills and bequests.

**Types of information**

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Types of information that The Friendlies Foundation collects and holds may include the following individuals/donors information:

- Name
- Date of birth
- Home address (postal and email)
- Home telephone numbers
- Health information (for participation in events)
- Name of organisation (if applicable)
- Name of business (if applicable)
- Address for organisation or business
- Fax number for organisation or business
- Business and/or personal email address of person: and or
- Amount donated, spent on products purchased from The Friendlies Foundation or The Friendlies Foundation suppliers
- Person to contact in case of an emergency (for participation at events)
- Bank details, credit cards and cheques
- Donors requests

Updated information is added to the donors' record every time a donation is made.

### **Collection of information**

According to the APP's The Friendlies Foundation must:

- Only collect personal information and financial information necessary for its functions or activities.
- Use fair and lawful ways, that are not unreasonable or intrusive, to collect personal information and financial information.
- Collect personal information and financial information from an individual if it is reasonable and practicable to do so.
- Take reasonable steps, at the time of collecting personal information and financial information or as soon as practical afterwards, to make an individual aware of why the information is being collected, who it may be disclosed to, how it can be accessed etc.
- Take reasonable steps to ensure the individual is aware of the above points even if the information is collected from someone else.
- Only collect personal information and financial information with the expressed or implied consent of the individual concerned, unless collection is required by law or it is necessary to prevent a serious threat to the life or health of any person.

### **Why does The Friendlies Foundation collect personal and financial information?**

Personal information and financial information is generated any time an individual is considering to donate or has donated to The Friendlies Foundation.

The Friendlies Foundation will, in the course of our work collect and hold personal information and financial information to:

- Gain an understanding of the individual's needs so we may provide them with the required advice.
  - Improve the quality of The Friendlies Foundation services.
  - Administer and manage financial services and where required by law.
  - Administer and account for donations and bequests.
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### **How is the personal information collected?**

The Friendlies Foundation will, if reasonable and practicable to do so, collect personal information and financial information directly from the individual concerned. This may take place when the individual completes documentation such as a donation form or another administrative form or when the donor gives The Friendlies Foundation personal or financial information in person or over the phone.

The Friendlies Foundation may collect personal information and financial information from third parties such as:

- A donor's representative (e.g. authorised representative or legal adviser).
- The Friendly Society Private Hospital.
- Previous hospital or foundation events which the person attended.

### **Disclosing personal information**

The Friendlies Foundation may disclose personal information for the purposes of:

- Conveying information to a responsible person (e.g. parent, guardian, spouse) when the individual is incapable or cannot communicate, unless the individual/donor has requested otherwise.
- Management, funding, service-monitoring, planning, evaluation and complaint handling functions.
- Quality assurance or audit activities.
- Research or compilation or analysis of statistics relevant to public health and safety.

The Friendlies Foundation will only provide personal information for the purposes of marketing and promotional activities with the individual's consent.

### **Access to and correction of information**

Records are the property of the Bundaberg Friendly Society Medical Institute the governing body of The Friendlies Foundation, however individuals have the right to access personal/health and financial information held about them, unless:

- It would pose a serious threat to the life or health of any individual.
- It would have an unreasonable impact on the privacy of others.
- The request for access is frivolous or vexatious.
- Denying access is required or authorised by law.

Access may be provided in a number of different ways. For example, the individual (or his/her authorised representative) may view and discuss their records with an officer of The Friendlies Foundation and/or obtain a copy of the information or a summarised report.

Access requests or related queries can be made to The Foundation Officer.

If a person requests a correction to their personal information or financial information, The Friendlies Foundation must either make the correction, where appropriate, or add a note to the records with details of the request. Requests for correction can be made via the Foundation Officer.

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A fee may be charged for collating and providing access to personal information and/or financial information.

### **Opt-out**

A person can opt-out of one or all of The Friendlies Foundation services at any time by contacting The Friendlies Foundation by email, phone or fax. Each fax, email and mail-out undertaken by The Friendlies Foundation gives all persons the option of not receiving further communication of the same nature. If a person wishes to access and/or alter their records with The Friendlies Foundation, they may do so and must tell The Friendlies Foundation:

- The name of the person making the request.
- The organisation making the request.
- Contact address and phone number of the person making the request.
- Identification (if required).

The Friendlies Foundation will process all verbal or written requests within 7 days of receiving the request.

### **Destroying Personal Information**

The Friendlies Foundation will retain personal information for an appropriate period as determined by The Friendlies Foundation and/or as required by law and when no longer needed, it will be destroyed by a secure means (APP 11.1 and 11.2)

### **Enquiries and complaints**

Complaints by individuals who believe that The Friendlies Foundation has breached their privacy in any way or wish to discuss any issues about the privacy policy, can be made to the The Friendlies Foundations Officer who will try to satisfy any questions and correct any errors on The Friendlies Foundation's part.

If The Friendlies Foundations Officer is not able to satisfactorily answer an individual's concerns, the individual has a right to make a complaint to the CEO of the Friendly Society Private Hospital or to the Office of the Australian Information Commissioner on:

**Phone:** 1300 363 992  
**Email:** enquiries@oaic.gov.au  
**Write:** GPO Box 5218, Sydney NSW 2001 GPO Box 2999,  
Canberra ACT 2601  
**Website:** www.oaic.gov.au

Or contact the Fundraising Institute Australia:

**In writing:** FIA's Privacy Policy  
Fundraising Institute Australia  
PO Box 642  
Chatswood NSW 2057

**In person:** Fundraising Institute Australia  
Level 2, 60 Archer Street  
Chatswood NSW 2067

**Fax:** Fundraising Institute Australia  
+61 (0)2 9411 6655

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## **Trans border data flows**

The Friendlies Foundation may only transfer a person's personal and financial information overseas when:

- The individual has given consent.
- The transfer is necessary for the fulfilment of a contract between the individual and the Foundation.
- The transfer is for the benefit of the individual but it is impracticable to obtain consent.

It is believed that the information will be protected by a privacy scheme or legal provisions comparable to what exists in this country.

### **Reviewed By**

The Friendlies Foundation Officer  
Chief Executive Officer  
Quality Assurance Manager - Compliance

### **Related Documents**

Not required

### **References**

The Privacy Act 1988, Australian Government, Office of the Australian Information Commissioner  
<http://www.oaic.gov.au/privacy/privacy-act/the-privacy-act>  
viewed 10 March 2014

The Privacy Law Reform 2014, Australian Government, Office of the Australian Information Commissioner, <http://www.oaic.gov.au/privacy/privacy-act/privacy-law-reform>  
viewed 10 March 2014

Australian Privacy Principles Guidelines, Privacy Act 1988, <http://www.oaic.gov.au/privacy/privacy-resources/privacy-fact-sheets/other/privacy-fact-sheet-17-australian-privacy-principles>

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