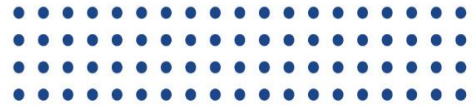




Privacy Policy

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Privacy Policy

DOCUMENT CONTROL

Classification	Public Policy Document
Submitted By	General Manager
Approved By	Management Committee
Date Reviewed /Approved	30 August 2016
Review Date(s)	August 2018, August 2020
Application	All Hobart Club Members, Parent/Guardians, facility users, PCYC Staff, Volunteers, Contractors and visitors
Managed By	Management Committee & General Manager
Relevant Legislation	Civil Liability Act 2002 (Tas) Personal Information and Protection Act 2004 (Tas) Privacy Act 1988 (Cwth) Registration to Work with Vulnerable People Act 2013 (Tas)

Privacy Policy

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Privacy Policy

1. INTRODUCTION

The Hobart Police and Community Youth Club Inc (Hobart PCYC) takes the issue of privacy very seriously and understands that privacy is an important issue for all people. This statement outlines the Hobart PCYC's policy on how we use and manage the personal information provided to, or collected by, our organisation.

The Hobart PCYC is bound by the Australian Privacy Principles (APP) contained in the Commonwealth Privacy Act and is compliant with the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

The Hobart PCYC may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to the Hobart PCYC's operations and practices and to make sure it remains appropriate to the changing legal environment.

2. PURPOSE

Hobart PCYC collects and administers a range of personal information for the purposes of processing membership applications, the health and safety of all facility users and for undertaking financial transactions. The organisation is committed to protecting the privacy of the personal information it collects, holds and administers.

The purpose of this policy is to provide an appropriate framework for Hobart PCYC and its stakeholders in dealing with privacy considerations.

3. PERSONS TO WHOM THIS POLICY APPLIES

This policy is applicable to all facility users, parents, guardians, caregivers, employees, or volunteers or prospective employees.

4. POLICY

4.1 TYPE OF INFORMATION COLLECTED

The type of information the Hobart PCYC collects and holds may include (but is not limited to) personal information, including sensitive information, about:

- (a) contact details and other details including:
 - i. Your full name (current and former), date of birth, gender and personal and/ or business contact details (including your address, landline or mobile telephone numbers, fax number and e-mail address);
 - ii. Your business contact details (including your company name, job title and business); and
 - iii. Contact and identification details of any third party that you have authorised to negotiate or provide your personal information on your behalf (including any attorneys appointed by you under a power of attorney);

- (b) information about you as a customer/member of Hobart PCYC including:
 - i. Any programs, services or products you purchased from us;
 - ii. Information about your visit to our website, such as your browser software, which pages you view and which items you "clicked" on or added to your shopping basket;
 - iii. Program, service, product or participation logs, which hold information about your use of our programs, services, products or websites;
 - iv. Interests and preferences that you specify during participation in a program or service; and
 - v. Commentary or opinion you provide relating to our services/ products;

- (c) banking and payment details including, bank account and credit card information, and any other information required for us to process donations and other transactions associated with our services;

- (d) any correspondence between you and Hobart PCYC; and

- (e) any other personal information provided to us when you make an inquiry or request information.

4.2 SENSITIVE INFORMATION

Hobart PCYC may also collect sensitive information from you.

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

Sensitive information is defined by the Privacy Act to be certain kinds of personal information which is subject to stricter controls. Examples of sensitive information that we may collect from you through providing information and other services to you include:

- (a) health and medical information;
- (b) racial ethnic origin;
- (c) political opinions; and
- (d) criminal history.

We will only collect sensitive information about you with your consent and if the sensitive information is reasonably necessary for our functions and activities. If we receive any sensitive information about you, we will handle it in accordance with this Privacy Policy, the Privacy Act and the APPs.

Hobart PCYC may collect personal information which is necessary for our programs and activities in several different ways. Please take care when submitting personal information to us, in particular when completing forms and other materials.

Where possible, Hobart PCYC will always try to collect personal information directly from you - for example when you:

- (a) request information or contact us through our website or by telephone;
- (b) complete a membership application form or participate in a program or activity organised by us;
- (c) correspond with us in writing (such as letters and emails);
- (d) provide your identification or other documents to us; or
- (e) meet with us in person.

Hobart PCYC may also obtain your personal information from third parties we deal with, such as:

- (a) our partner organisations;
- (b) government and law enforcement agencies;
- (c) our professional advisers;
- (d) our contracted service providers for (example, fundraising service providers); and
- (e) any other organisation with whom we do business.

Where we collect personal information from third parties you refer to us, we will assume, and you should ensure, that you have made that third party aware of the referral and the purposes of collection, use and disclosure of the relevant personal information.

If you are asked to provide details about other people, please ensure that these individuals are happy for their details to be given to the Hobart PCYC and used for the purposes set out in this Privacy Policy (which may include using their details for marketing purposes).

4.3 DISCLOSING YOUR PERSONAL INFORMATION

Hobart PCYC discloses personal information for the purpose it was collected (known as the 'primary purpose'). We may also disclose personal information for a secondary purpose if a permitted situation applies.

In carrying out our functions and activities we may disclose your personal information to the following:

- (a) our business partners, stakeholders and service providers (including Federal and State Government bodies, and contractors who may provide website, IT, marketing, administration and other services to support Hobart PCYC.);
- (b) our professional advisers (for example, our insurers, auditors, lawyers and consultants);
- (c) third parties we engage to carry our promotions or other activities you have requested, or for direct marketing purposes (unless you have opted-out of direct marketing communications);
- (d) any entity to whom we are required or authorised by law to disclose your personal information (for example, law enforcement agencies and government and regulatory authorities);
- (e) any successors in title to our organisation or functions and activities; and
- (f) other entities with your consent (express or implied).

The above entities may in turn disclose your personal information to other entities as described in their respective privacy policies or notices.

Hobart PCYC may prepare anonymous, aggregated or generic data (including "generic" statistics) for a number of purposes, including for program and service development, business promotion and research purposes. This is anonymous data and not personal information and we may share it with any third party (such as our partners, advertisers, industry bodies, the media and/or the general public).

The Hobart PCYC will use personal information it collects from you for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected, or to which you have consented.

In relation to direct marketing, the Hobart PCYC will use your personal information for direct marketing where you have provided that information, and you are likely to expect direct marketing. We will always obtain your consent to use sensitive information as the basis for any of our direct marketing.

We may use video surveillance for security purposes and the footage will be used only by the Hobart PCYC and by the providers of our security services for security purposes. Surveillance videos are not used by the Hobart PCYC for other purposes and the footage is not publicly available. Surveillance cameras are not located in any bathrooms or change room facilities.

4.4 DEALING WITH HOBART PCYC ONLINE (INCLUDING SOCIAL MEDIA)

This Privacy Policy applies to your use of the Hobart PCYC website and related websites that Hobart PCYC may create from time to time and any personal information that you may provide to us via these sources.

A number of our online services allow you to upload and share messages, photos, video and other content and links with others and/or create a publicly accessible profile for your account. For example:

- (a) our website and social media sites, that allow you to submit comments and information.
- (b) our Facebook account that allow you to submit comments which are visible to other users of that service; and
- (c) other services which allow you to share a link which if clicked on may allow the recipient to access your uploaded content.

4.5 PERSONAL INFORMATION STORAGE AND SECURITY ARRANGEMENTS

Hobart PCYC takes reasonable steps to protect your personal information from interference, loss, misuse, unauthorised access, modification or disclosure.

Hobart PCYC may store your personal information in different forms, including in hardcopy and electronic form. Hobart PCYC has established policies, procedures and systems to keep your personal information secure - including but not limited to password protection and securing physical storage arrangements.

When Hobart PCYC no longer requires your personal information, we will take reasonable steps to destroy, delete or de-identify your personal information in a secure manner. However, Hobart PCYC may sometimes be required by law to retain certain personal information.

4.6 ACCESSING/UPDATING YOUR PERSONAL INFORMATION

Subject to the guidelines set out in the Australian Privacy Principles you can access the personal information that we hold. Access may be declined if it would interfere with the privacy of other persons or if it breaches any confidentiality that attaches to that information.

The Hobart PCYC endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. A person may seek to update their personal information held by the Hobart PCYC by contacting the Reception staff, Privacy Officer or the General Manager of the Hobart PCYC at any time.

The Australian Privacy Principles requires that Hobart PCYC not to store personal information longer than necessary. In addition to this, the Australian Taxation Office imposes certain obligations about the length of time certain records must be stored.

You have the right to check what personal information the Hobart PCYC holds about you.

Under the Commonwealth Privacy Act, an individual has the right to obtain access to any personal information which the Hobart PCYC holds about them and to advise the Hobart PCYC of any perceived inaccuracy. There are some exceptions to this right set out in the applicable legislation. To make a request to access any information the Hobart PCYC holds about you, please contact the General Manager or Privacy Officer in writing.

The Hobart PCYC may require you to verify your identity and specify what information you require. Although no fee will be charged for accessing your personal information or making a correction, the Hobart PCYC may charge a fee to retrieve and copy any material. If the information sought is extensive, the Hobart PCYC will advise the likely cost in advance.

5. KEY DEFINITIONS

- **Child** means a person who has not yet attained the age of 18 years.
- **Data Breach** means when a personal information is accessed, disclosed without authorisation, or is lost.
- **General Manager** means the General Manager of the Hobart PCYC.
- **Management** means the General Manager or designated staff member.
- **Management Committee** means the Hobart PCYC Management Committee.
- **President** means the President of the Hobart PCYC Management Committee.
- **Privacy** generally speaking, includes the right:
 - (a) to be free from interference and intrusion;
 - (b) to associate freely with whom you want; and
 - (c) to be able to control who can see or use information about you.
- **Privacy Officer** means a person appointed by Hobart PCYC to accept matters relating to privacy issues in addition to the General Manager or Management Committee.
- **Privacy Policy** means a statement that explains how an organisation or agency handles your personal information.
- **Staff member** means any person, waged or unwaged, who performs a service for, with, or on behalf of the Hobart PCYC and includes office holders, Committee Members, activity leaders, assistants and contractors.
- **WWVP Registration** means registration process provided by the Tasmanian Department of Justice.

6. LEGISLATION AND POLICY DOCUMENTS

Legislation

- Registration to Work with Vulnerable People Act 2013 (Tas)
- Youth Justice Act 1997 (Tas)
- Civil Liability Act 2002 (Tas)

Policy Documents

- Hobart PCYC Data Breach Policy
- Hobart PCYC Grievance Policy
- Hobart PCYC Member Protection Policy
- Hobart PCYC Privacy Policy

7. CHANGES TO OUR PRIVACY POLICY

Hobart PCYC welcomes your questions and any suggestions you may have about our Privacy Policy.

We reserve the right to revise or supplement this Privacy Policy from time to time. Any updated version of this Privacy Policy will be posted on our official website and will be effective from the date of posting.

You should bookmark and periodically review this page to ensure that you are familiar with the most current version of this Privacy Policy so that you remain aware of the way we handle your personal information.

This Privacy Policy was first introduced on 30 August 2016 and is reviewed on a regular basis.

8. ENQUIRIES AND COMPLAINTS

If you would like further information about the way the Hobart PCYC manages the personal information it holds or have any concerns, complaints or you think there has been a breach of privacy, please contact the General Manager or Privacy Officer by any of the following avenues:

P: 300 Liverpool Street, Hobart, 7000

T: (03) 6107 9206

E: enquiries@hobartpcyc.org.au

E: generalmanager@hobartpcyc.org.au