



Privacy Policy

FAIRNESS | INTEGRITY | RESPECT | EMPATHY

Document Version Control

Greenacres will maintain a high standard of quality and control of all documented information and records. All documents (either retained or referred to) within Greenacres Quality Management System (QMS) will be current, suitable for use, accessible, quality controlled, and stored in a safe and secure location.

Greenacres policies will be reviewed by the relevant senior manager when: a known change has occurred; an incident or complaint has been received; or prior to the mandatory three year review period where no other reviews have occurred.

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	002	KMT & SC	Converted to new format	14/07/2020	Draft
	003	Functional Team	Added reference to Health Records and Information Privacy Act 2002 (NSW), Health Privacy Principles, extended purpose for which info is used, explained staff Privacy training, updated Privacy Officer details and added Office of the Australian Information Commissioner and NSW Privacy Commissioner to complaints procedure.	27/01/2021	Draft
	004	KMT	Added reference to storage "in the cloud" (7.1), new section 10 (Other rights) and new clause 11.3 (investigating and notifying data breaches)	17/08/2022	Draft
	005	KMT	Amended document content and format to mirror Salinger Consulting's Privacy Policy Template (Edition 1.5, March 2021)	12/09/2022	Draft
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1 OUR PRIVACY OBLIGATIONS

- 1.1 Greenacres is governed by the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cth). The APPs regulate how personal information is handled by Greenacres.
- 1.2 'Personal information' means information or an opinion about an identified individual, or an individual who is reasonably identifiable. Greenacres' Privacy Policy applies to personal information collected and/or held by Greenacres.
- 1.3 Additionally, as a health service provider or organisation operating in NSW that collects, holds or uses health information, Greenacres is also governed by the [Health Records & Information Privacy Act 2002 \(NSW\)](#).

2 THE TYPES OF PERSONAL INFORMATION WE COLLECT AND HOLD

- 2.1 We collect personal information about our participants as part of our routine activities.

- 2.2 We also collect personal information about our staff, volunteers, contractors, suppliers, corporate customers and donors, as well as the contact details of individuals who work for contractors and suppliers, and other types of professional associates and personal contacts.

How we collect personal information

Information that you specifically give us

- 2.3 We may ask you to provide us with certain types of personal information if you wish to obtain a particular service or product from us. This might happen over the telephone, through our website, by filling in a paper form, or meeting with us face-to-face. When collecting personal information from you, Greenacres will obtain your consent to the collection and explain how the information will be used and disclosed.
- 2.4 You might also provide your personal information to us without us directly asking for it, for example if you engage with us on social media.

Information that we collect from others

- 2.5 If you apply for a job or contract with us, we will collect personal information about you from your referees. With your consent, we may also use a third-party service to ensure your employment, educational and identity records are valid. We may also check some details about our suppliers from publicly available sources, such as the Australian Business Register and ASIC databases.

Information that we generate ourselves

- 2.6 We maintain records of the interactions we have with participants, including the products and services we have provided to you.
- 2.7 We collect limited information about users of our websites, for diagnostic and analytic purposes. We use cookies and gather IP addresses to do so, but we do not trace these back to individual users.
- 2.8 We gather and log IP addresses of staff for our internal Enterprise Resource Planning system (QuestX).

The types of personal information we collect

- 2.9 The types of personal information we collect about our participants includes:
- 2.9.1 contact details (name, address, email etc.),
 - 2.9.2 personal details, including date of birth, gender, income,
 - 2.9.3 information on personal issues and experiences, relationships,
 - 2.9.4 photographs, videos and digital fingerprints,
 - 2.9.5 family background, racial, religious and ethnic background, supports participants may have in the community,
 - 2.9.6 areas of interest, and
 - 2.9.7 health information and/or medical history.

Health information

- 2.10 As part of administering our services, Greenacres may collect health information. For example, Greenacres collects health information, such as medical history, from some participants participating in Greenacres' programs. When collecting health information from

you, Greenacres will obtain your consent to the collection and explain how the information will be used and disclosed.

- 2.11 If health information is collected from a third party, such as your doctor, Greenacres will inform you that this information has been collected and will explain how this information will be used and disclosed.
- 2.12 Greenacres will not use health information beyond the consent provided by you unless your further consent is obtained or in accordance with one of the exceptions under the [Privacy Act](#) or in compliance with another law. If Greenacres uses your health information for research or statistical purposes, it will be de-identified if it is practicable to do so.

Links to other sites

- 2.13 On our website, we may provide links to third party websites. These linked sites are not under our control, and we cannot accept responsibility for the conduct of companies linked to our website. Before providing your personal information via any other website, we advise you to examine the terms and conditions of using that website and its privacy policy.

3 HOW WE USE PERSONAL INFORMATION

- 3.1 We may use your personal information for the following purposes:
 - 3.1.1 to provide participants with the most appropriate services for their needs,
 - 3.1.2 to meet requirements of Government funding,
 - 3.1.3 to enable billing of our services or payment of your services,
 - 3.1.4 to provide technical or other support to you,
 - 3.1.5 to answer your enquiry about our services, or to respond to a complaint,
 - 3.1.6 to manage our employment or business relationship with you,
 - 3.1.7 to promote our other programs, products or services which may be of interest to you (unless you have opted out from such communications),
 - 3.1.8 to comply with legal and regulatory obligations, including internal and external audits,
 - 3.1.9 if otherwise permitted or required by law,
 - 3.1.10 to communicate with existing clients, carers, potential clients, members, affiliates, etc.,
 - 3.1.11 to process donations,
 - 3.1.12 to facilitate fund raising activities (such as advertising events),
 - 3.1.13 to establish and manage partnerships,
 - 3.1.14 to process applications of membership, and
 - 3.1.15 to contact relevant people in times of emergency, or
 - 3.1.16 for other purposes with your consent, unless you withdraw your consent.

Information type: Name, email address and postal address		
How we use it	Why we use it	Why that is necessary
To send you updates	To ensure you are kept informed of important updates	We think of this as good customer service
To send you discount offers and other promotional / marketing material (if you have chosen to receive marketing messages from us)	To ensure you receive discounts and offers relevant to you	If you have chosen to receive marketing messages from us, we think of this as good customer service You can unsubscribe at any time
Information type: Payment information		
How we use it	Why we use it	Why that is necessary
To process your payment	To ensure that we get paid when you buy something from us or we need to be reimbursed for something we purchased on your behalf	This is part of the conditions of sale or included in our Service Agreement with us
To process any refunds	To ensure that you get paid any refunds if they are due to you when you return an item	This is part of the conditions of sale
To keep a record of all our financial transactions	To keep our accounts accurate, and report to the tax office	This is required by law
Information type: Health information		
How we use it	Why we use it	Why that is necessary
To enable us to keep you happy, healthy and safe	To ensure we are able to provide you the most appropriate services for your needs	To keep you safe and healthy and to comply with our obligations under the NDIS

4 WHEN WE DISCLOSE PERSONAL INFORMATION

Our third party service providers

- 4.1 The personal information of Greenacres' participants, staff, suppliers, corporate customers and other contacts may be held on our behalf outside Australia, including 'in the cloud', by our third-party service providers.
- 4.2 If we were required to send information outside of Australia, we would take measures to protect that information; either by ensuring that the country of destination has similar protections in relation to privacy, or entering into contractual arrangements with the recipient of the information requiring them to manage your personal information in accordance with the Australian Privacy Principles and Health Privacy Principles.

- 4.3 Before any decision to store data outside of Australia is made, it must first be endorsed by the appropriate Executive Officer (EO) before being approved by the Chief Executive Officer (CEO).
- 4.4 Our backup of data is encrypted, and we endeavour to enforce any third parties to retain this data solely on physical sites located within Australia.
- 4.5 Our third-party service providers are Microsoft Office 365, Zendesk, Insightly, MailChimp, Emplive, HR3, WordPress, Microsoft Navision.

Other disclosures and transfers

- 4.6 We may disclose your personal information to external organisations including:
 - 4.6.1 government departments and agencies who provide funding for Greenacres' services,
 - 4.6.2 contractors who manage some of the services you access. Steps are taken to ensure they comply with the Privacy Act when they handle personal information and are authorized only to use personal information in order to provide the services,
 - 4.6.3 doctors and health care professionals who assist us to deliver our services,
 - 4.6.4 other regulatory bodies, such as NDIS Quality and Safeguards Commission, SafeWork NSW,
 - 4.6.5 our professional advisors, including our accountants, auditors and lawyers,
 - 4.6.6 information technology (IT) partners who facilitate the collection, storage and security of our data and support our IT infrastructure, and
 - 4.6.7 a court or other legal authority as required by law.
- 4.7 Except as set out above, Greenacres will not disclose your personal information to a third party unless one of the following applies:
 - 4.7.1 you have consented,
 - 4.7.2 you would reasonably expect us to use or give that information for another purpose related to the purpose for which it was collected or, in the case of sensitive information, directly related to the purpose for which it was collected.
 - 4.7.3 it is otherwise required or authorised by law,
 - 4.7.4 it will prevent or lessen a serious threat to somebody's life, health or safety or to public health or safety,
 - 4.7.5 it is reasonably necessary for us to take appropriate action in relation to suspected unlawful activity or misconduct of a serious nature that relates to our functions or activities,
 - 4.7.6 it is reasonably necessary to assist in locating a missing person,
 - 4.7.7 it is reasonably necessary to establish, exercise or defend a claim at law,
 - 4.7.8 it is reasonably necessary for a confidential dispute resolution process,
 - 4.7.9 it is necessary to provide a health service,
 - 4.7.10 it is necessary for the management, funding or monitoring of a health service relevant to public health or public safety,

- 4.7.11 it is necessary for research or the compilation or analysis of statistics relevant to public health or public safety, or
- 4.7.12 it is reasonably necessary for the enforcement of a law conducted by an enforcement body.

5 SECURITY OF YOUR PERSONAL INFORMATION

- 5.1 We will take reasonable security measures to protect personal information from loss, unauthorised access, use, modification or disclosure.
- 5.2 These steps include password protection and role-based delegations for accessing our electronic IT systems, installing firewalls, anti-virus software and securing paper files in locked cabinets that have physical access restrictions. Only authorised personnel are permitted to access these details.
- 5.3 Greenacres ensures its staff have received training about its workplace policies and procedures that cover access, storage and security of information, and that its policies and procedures have been implemented, have been communicated and are readily available.
- 5.4 When the personal information is no longer required, it is destroyed in a secure manner, or deleted according to our QMS Document Control Procedure
- 5.5 You can also help to protect the privacy of your personal information by letting us know as soon as possible if you become aware of any security breach.
- 5.6 We will take reasonable steps to ensure personal information is stored securely, not kept longer than necessary, and disposed of appropriately.

6 ACCESSING OR CORRECTING YOUR PERSONAL INFORMATION

- 6.1 You have the right to request access to the personal information Greenacres holds about you. Unless an exception applies, we must allow you to see the personal information we hold about you, within a reasonable time period, usually within 14 days of your request, and without unreasonable expense. Greenacres may charge you reasonable fees to reimburse us for the cost we incur relating to your request for access to information, including in relation to photocopying and delivery cost of information.
- 6.2 In situations where the request is complicated or requires access to a large volume of information or an archive search, we will take all reasonable steps to provide access to the information requested within 30 days.
- 6.3 You also have the right to request the correction of the personal information we hold about you. We will take reasonable steps to make appropriate corrections to personal information so that it is accurate, complete and up-to-date. Unless an exception applies, we must update, correct, amend or delete the personal information we hold about you within a reasonable time period, usually within 14 days of your request. We will not charge for making corrections.
- 6.4 Requests for access and/or correction should be made to the Privacy Officer, whose details are provided below. For security reasons, you will be required to put your request in writing and provide proof of your identity. This is necessary to ensure that personal information is provided only to the correct individuals and that the privacy of others is not compromised.

- 6.5 In the first instance, Greenacres will generally provide a summary of the information held about you. Unless told otherwise, it will be presumed that the request relates to current records. These current records will include personal information which is included in Greenacres' databases and in paper files, and which may be used on a day-to-day basis.
- 6.6 Greenacres will provide access by allowing you to inspect, take notes or print outs of personal information that we hold about you. If personal information (for example, your name and address details) is duplicated across different databases, Greenacres will generally provide one printout of this information, rather than multiple printouts.
- 6.7 Access will be denied if:
- 6.7.1 the request does not relate to the personal information of the person making the request,
 - 6.7.2 providing access would pose a serious threat to the life, health or safety of a person or to public health or public safety,
 - 6.7.3 providing access would create an unreasonable impact on the privacy of others,
 - 6.7.4 the request is frivolous and vexatious,
 - 6.7.5 the request relates to existing or anticipated legal proceedings,
 - 6.7.6 providing access would prejudice negotiations with the individual making the request,
 - 6.7.7 access would be unlawful,
 - 6.7.8 denial of access is authorised or required by law,
 - 6.7.9 access would prejudice law enforcement activities,
 - 6.7.10 access would prejudice an action in relation to suspected unlawful activity or misconduct of a serious nature relating to the functions or activities of Greenacres,
 - 6.7.11 access discloses a 'commercially sensitive' decision making process or information, or
 - 6.7.12 any other reason to do so is provided under the [Privacy Act](#).
- 6.8 If we deny access to information, we will state our reasons for denying access. Where there is a dispute about your right of access to information or forms of access, this will be dealt with in accordance with Greenacres' Feedback and Complaints Procedure.
- 6.9 To seek access to, or correction of, your personal information, please contact our Privacy Officer.

7 EXERCISING YOUR OTHER RIGHTS

- 7.1 You have a number of other rights in relation to the personal data Greenacres holds about you. You have the right to:
- 7.1.1 opt-out of direct marketing, and profiling for marketing,
 - 7.1.2 opt-out of processing for research / statistical purposes, or processing on the grounds of 'public interest' or 'legitimate interest',
 - 7.1.3 erasure,

7.1.4 data portability, and

7.1.5 temporary restriction of processing.

7.2 To seek to exercise any of those rights, please contact our Privacy Officer.

8 TO CONTACT OUR PRIVACY OFFICER

8.1 If you have an enquiry or a complaint about the way we handle your personal information, or to seek to exercise your privacy rights in relation to the personal information we hold about you, you may contact our Privacy Officer as follows:

OUR PRIVACY OFFICER IS:
Stephanie McKay
Chief People Officer
Telephone: 02 4222 6200
Email: stephaniem@greenacres.net.au
Mail: P O Box 1419, WOLLONGONG, NSW, 2500

8.2 While we endeavour to resolve complaints quickly and informally, if you wish to proceed to a formal privacy complaint, we request that you make your complaint in writing to our Privacy Officer, by mail or email as above. We will acknowledge your formal complaint within 10 working days.

8.3 If we do not resolve your privacy complaint to your satisfaction, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC) by calling them on 1300 363 992, making a complaint online at www.oaic.gov.au, or writing to them at OAIC, GPO Box 5218, Sydney NSW 2001.

Assisted Contact

8.4 If you are hearing or speech impaired, and you need assistance to communicate with us, contact our Privacy Officer and suitable arrangements will be made for you to communicate with us.

8.5 If you do not speak English, or English is your second language, and you need assistance to communicate with us, call our Privacy Officer and arrangements will be made for the use of a translator.

9 DATA BREACHES

9.1 Greenacres has procedures in place to respond to any data breach in accordance with the Notifiable Data Breaches (NDB) Scheme as per the Australian Privacy Act.

9.2 Greenacres Staff are to refer to Section 16 (Compromise/Hack) of Greenacres' Computer User (IT) Policy for the steps to be taken when it is suspected that our systems or your account has been compromised.

- 9.3 Greenacres' Privacy Officer will investigate all reports of a data breach, whether actual or suspected, in accordance with the OAIC's data breach preparation & response guide, including notifying individuals about an eligible data breach.

10 RELATED LEGISLATION, DOCUMENTS AND WEBSITES

Australian Privacy Principles (APPs)

Computer User (IT) Policy

Greenacres' website

Health Records and Information Privacy Act 2002 (NSW)

Notifiable Data Breaches (NDB) Scheme

Office of the Australian Information Commissioner's Data Breach Preparation and Response Guide

Office of the Australian Information Commissioner's Notifying individuals about an eligible data breach

Office of the Australian Information Commissioner

Privacy Act 1988

Privacy Statement