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Drafted by	P.Shakes	Approved by Board on	26/09/2022
Responsible person	P.Shakes	Scheduled review date	26/09/2024

PRIVACY POLICY

Your privacy is important.

This is an outline of how we (*Through the Unexpected*) collect, use and store your personal information.

We have “opted-in” to the Australian Privacy Principles contained in the Commonwealth Privacy Act 1988 and are guided by the Privacy Amendment (Enhancing Privacy Protection) Act 2012. This means that we have chosen to comply with the Privacy Act as we are committed to respecting your privacy.

We may need to update this Privacy Policy when new laws and technology arise. We assume that you are a resident of Australia, if not please contact us to ask about how we manage your personal information.

What kind of personal information do we collect and how?

The type of information we collect and hold depends on how you engage with us and may include;

- Anonymous information that is collated and used for understanding how many people come to our website and the pages accessed,
- Personal information such as your name, email address and profession if you sign up to our newsletter, or your address also if you become a member,
- Information that includes your gender and pronouns, if you opt to include them,
- Sensitive information such as whether you identify as a person with the lived experience of receiving a prenatal diagnosis, as a disabled person or a person with a disability or congenital anomaly, or a carer.
- Further personal information if you become an officeholder, volunteer or apply for job with us.

Personal information you provide:

We will generally collect personal information held about an individual by way of your direct contact with us by phone, in person or by email, or through online forms that you fill in.

You can remain anonymous or use a pseudonym, but in some circumstances we may not be able to provide you with accurate or helpful information if you choose not to identify yourself.

Personal information provided by other people:

In some circumstances we may be provided with personal information about you from a third party, this may happen if you have asked that person to refer you to us.

If you are an employee of *Through the Unexpected*:

Under the Privacy Act the Australian Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to *Through the Unexpected's* treatment of an employee record, where the treatment is directly related to a current or former employment relationship between *Through the Unexpected* and employee. However, *Through the Unexpected* must provide access and ensure compliance with the Health Privacy Principles under the Victorian Health Records Act 2001 in relation to any health information held about employees.

How will we use the personal information you provide?

We will only use the information you provide us, for reason that you gave it to us or for other related reasons that you would reasonably expect or have consented to.

We will use your personal information to send you information about *Through the Unexpected*, referred to as direct marketing. We will only send you information where you have provided your personal details, and you are likely to expect direct marketing: all direct marketing will include an opt out option.

If we use your personal information obtained from elsewhere we will still send you direct marketing information where you have consented and which will also contain an opt out. We will always obtain your consent to use sensitive information as the basis for any of our direct marketing.

Marketing and fundraising:

Marketing and fundraising is important for us to be able to work towards reducing the distress and mental health conditions associated with prenatal diagnosis. Sometimes we may need help or use a third-party platform for marketing and fundraising. Your personal information may be shared for the purpose of contacting you. Your sensitive information will not be shared for this purpose unless you provide explicit consent.

Who might we disclose personal information to?

With your explicit permission we may disclose personal information, including sensitive information, held about you to:

- government departments;
- people providing services to *Through the Unexpected*,
- anyone you authorise *Through the Unexpected* to disclose information to.

An example of this would be a situation where you have provided consent to share your story for advocacy purposes without being anonymous.

Sending information overseas:

With the exception of the use of cloud-based programs for information storage, we will not send your personal information outside Australia without:

- obtaining your consent (in some cases this consent will be implied); or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

We use overseas providers of website programs and cloud services.

This means that your personal information may be collected, stored or transferred between the countries that our IT providers and platforms exist within. Further information can be found at;

- Microsoft Privacy Statement <https://privacy.microsoft.com/en-ca/privacystatement/>

How do we treat sensitive information?

In referring to 'sensitive information', we mean:

“information relating to a person’s racial ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual orientation or criminal record, that is also personal information; and health information about an individual”.

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.

Management and security of personal information

Our staff and volunteers are required to respect your confidentiality and privacy.

We have steps in place to protect your personal information from misuse, loss, unauthorised access, modification, interference or disclosure by use of various methods including locked storage of paper records and passworded access rights to computerised records.

When you use our website, having your cookies enabled will allow us to maintain the continuity of your browsing session and remember your details when you return, this may mean you remain logged into the website if you are a member. We may also use web beacons, Flash local stored objects and JavaScript. If you adjust your browser settings to block, reject or delete these functions, the webpage may not function in an optimal manner. We may also collect information about your IP address, although this will not identify you.

Updating personal information

We hope to ensure that the personal information we hold is accurate, complete and up-to-date. You can update your personal information by writing to info@throughtheunexpected.org.au anytime. You have the right to check what personal information we hold about you and to update any information that you think is wrong.

We may require you to verify your identity and specify what information you require. No fee will be charged for you to access your information.

How long will the *Through the Unexpected* keep my information?

The Australian Privacy Principles and the Health Privacy Principles require us to dispose of personal information that is no longer needed. In particular, the Health Privacy Principles impose certain obligations about the length of time health records must be stored.

Your personal information that is no longer required will be de-identified or destroyed. In many circumstances, however, it will be kept for marketing purposes, if you will have consented to that in writing with us.

Enquiries and privacy complaints

If you would like further information about the way we manage your personal information or have any concerns please contact us at info@throughtheunexpected.org.au

If we then have not dealt satisfactorily with your concerns we will meet with you to discuss further. If you are not satisfied with our response to your complaint within 30 days from this meeting then you can refer your complaint to the Office of the Australian Information Commissioner via:

- email: enquiries@oaic.gov.au
- tel: 1300 363 992
- fax: +61 2 9284 9666

Policy approved by The Board of Directors, 26/09/2022

P.Shakes (Executive Director)

