



## PRIVACY POLICY

Policy number	2208	Version	3
Drafted by	NRF, Bell Partners & CEO	Approved by Board on	30 August 2022
Responsible person	CEO	Scheduled review date	August 2023

### INTRODUCTION

Australian War Widows NSW Ltd (ABN 24 083 075 914) (AWWNSW, we, our, us) is committed to protecting the privacy and the rights of individuals in relation to their personal information. This document is our privacy policy and it tells you how we collect and manage your personal information.

This document was prepared with the assistance of Norton Rose Fulbright and Bell Partners and cannot be reproduced without the consent of Norton Rose Fulbright, Bell Partners and Australian War Widows NSW Ltd.

### PURPOSE

To explain to all members, individuals, staff, volunteers and Directors how AWWNSW handles personal information.

Privacy Statement: *“We respect your rights to privacy under the Privacy Act 1988 (Cth) (as amended) (Privacy Act) and we comply with all of the Privacy Act’s requirements in respect of the collection, management and disclosure of your personal information.”*

### SCOPE

This policy applies to all staff, volunteers and Directors of AWWNSW to protect the interests of individuals we interact with and collect information about.

### EXPRESS DEFINITIONS

**Member(s):** means financial and non-financial members. It includes all of those persons receiving support or services from AWWNSW.

**Personal Information:** When used in this privacy policy, the term “personal information” has the meaning given to it in the Privacy Act. In general terms, it is any information that can be used to personally identify you. This may include your name, address, telephone number, email address, profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

**Cookie:** is a small summary file containing a unique ID number that is sent to your computer.



## POLICY

### 1. Information we collect and hold

1.1 We may collect the following types of personal information:

- a) full name, including, but not limited to, the names of our members
- b) mailing or street address
- c) age and/or date of birth
- d) email address
- e) telephone number
- f) credit card number (with your specific consent)
- g) disabilities or health information (with your specific consent)
- h) Veterans' Affairs reference numbers (with your specific consent)
- i) any additional information relating to you that you provide to us directly or indirectly through our websites and services, or through our representatives, volunteers or otherwise; and
- j) information you provide to us through our surveys or visits by our representatives from time to time.

1.2 We may collect some information that is not personal information. This information does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how users use our website.

### 2. Collection of information

2.1 We collect your personal information directly from you unless it is unreasonable or impracticable to do so. When collecting personal information from you, we may collect in ways including:

- a) through membership application and renewal forms
- b) through your access and use of our website
- c) when you provide donations to us
- d) during conversations between you and our representatives or volunteers; or
- e) when you engage with our programs and services.

2.2 We may also collect personal information about other individuals from you. In such instances, you acknowledge that you have received the necessary consent(s) to share that other person's personal information with us.

2.3 We may collect personal information about you from third parties including:

- a) other ex-service organisations or veteran support charities
- b) advocates
- c) next of kins; or
- d) government entities



### 3. Use of Cookies

- 3.1 In some cases, we may also collect your personal information through the use of cookies. When you access our website, we may send a cookie. This enables us to recognise your computer and greet you each time you visit our website without bothering you with a request to register. It also enables us to keep track of products or services you view so that, if you consent, we can send you news about those products or services.
- 3.2 We also use cookies to measure traffic patterns, to determine which areas of our website have been visited and to measure transaction patterns in the aggregate. We use this to research our users' habits so that we can improve our online products and services.
- 3.3 If you do not wish to receive cookies, you can set your browser so that your computer does not accept them.
- 3.4 We may log IP addresses (that is, the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track users' movements, and gather broad demographic information.

### 4. Use and disclosure of personal information

- 4.1 We collect personal information about you so that we can perform our business activities and functions and to provide best possible quality of customer service.
- 4.2 We collect, hold, use and disclose your personal information for the following purposes:
- a) to provide products, programs, and services to you. Including sending communications to you
  - b) to answer enquiries and provide information to you about us and our operations
  - c) verifying your identity
  - d) processing your membership application
  - e) processing donations and/or annual subscriptions
  - f) to conduct business processing functions including providing personal information to our affiliates, contractors, service providers or other third parties
  - g) for the administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes of AWWNSW, and our affiliates, contractors or service providers
  - h) to provide your updated personal information to our affiliates, contractors or service providers
  - i) to update our records and keep your contact details up to date
  - j) to process and respond to any request or complaint made by you
  - k) to improve our services and/or website
  - l) to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country; and
  - m) any other purpose as notified prior to collection of your personal information from time to time.



4.3 Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

4.4 We may disclose your personal information to:

- a) our employees, directors, volunteers, advisors, contractors or service providers
- b) our partners and affiliates
- c) suppliers and other third parties with whom we have commercial relationships, for business, marketing, and related purposes; and
- d) any organisation for any authorised purpose with your express consent.

4.5 We may combine or share any information that we collect from you with information collected by any of our related bodies corporate (within Australia).

5.6 Where your personal information was collected for a particular purpose (the primary purpose), we won't use or disclose the information for another purpose (the secondary purpose) unless:

- (a) you allow us to; or
- (b) we are compelled or allowed to do so by law
- (c) we believe that the use or disclosure of the information is reasonably necessary for law enforcement related reasons conducted by an enforcement body and we will keep records of that use
- (d) you would reasonably expect us to deal with the information for the secondary purpose and the secondary purpose is:
  - (i) if the information is sensitive information—directly related to the primary purpose; or
  - (ii) if the information is non-sensitive information—related to the primary purpose; or
  - (iii) if we are required to by law, we will take reasonable steps to ensure that the information is not capable of identifying you before we disclose it.
- (e) if we collect personal information from one of our related companies this clause applies as if our primary purpose for the collection of the information was the primary purpose for which the related company collected the information.

## 5. Direct marketing

6.1 We will not use or disclose the information for direct marketing without your consent, except as set out below.

6.2 We may use your personal information (but not sensitive information) for the purpose of direct marketing if, and only if:

- (a) we collected your personal information from you
- (b) you would reasonably expect us to use your personal information for marketing purposes
- (c) you haven't opted out of receiving marketing information or promotions from us; and



- (i) in each marketing communication, we give you the ability to opt-out of receiving additional marketing communications
- (e) we provide a simple way for you to easily request not to receive direct marketing communications from us
- (f) we include a prominent statement that you may make such a request
- (g) we otherwise draw your attention to the fact that you may opt-out; or
- (h) you haven't made such a request to us.

6.3 If we use or disclose your personal information:

- (a) for the purpose of marketing by us, you may request not to receive further marketing communications from us; or
- (b) for the purpose of marketing by someone else, you may request us not to use or disclose your personal information for that purpose; and
- (c) you may request that we provide the source of the information.

6.4 If you make a request under clause 6.3, we will not charge you for the making the request or meeting it and we will respond to the request in a reasonable time as required by law.

## 7. Access to your personal information

7.1 You may request access to any personal information we hold about you at any time by contacting us (see the details below).

7.2 Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We may charge you a fee to cover our administrative and other reasonable costs in providing the information to you.

7.3 There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if:

- (a) we reasonably believe that providing such access would pose a serious threat to the life, health or the safety and well-being of any person, or to public health or safety
- (b) giving access would have an unreasonable impact on the privacy of another person
- (c) the request for access is frivolous or without a proper purpose
- (d) the information relates to existing or anticipated legal proceedings between us and you, and would not be accessible by the process of discovery
- (e) giving access would reveal our intentions in relation to negotiations with the you in such a way as to prejudice them
- (f) we are allowed or required by law not to give you access
- (g) we reasonably suspect that unlawful activity, or misconduct, that relates to our functions or activities has been, is being or may be committed and that giving access would be likely to prejudice the taking of appropriate action by us



- (h) giving access would be likely to prejudice one or more enforcement related activities conducted by an enforcement body; and
- (i) giving access would reveal information we have generated for a commercially sensitive decision-making processes.

7.4 If you believe that personal information, we hold about you is incorrect, incomplete, or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment, then we will add a note to the personal information stating that you disagree with it.

## 8 Complaining about a breach of privacy

8.1 If you believe that your privacy has been breached, please contact our Privacy Officer using the contact information below and provide details of the incident so that we can investigate it.

8.2 We request that complaints about breaches of privacy be made in writing, so we can be sure about the details of the complaint.

8.3 Our Privacy Officer deals with privacy complaints and any complaints should be directed to our Privacy Officer using the contact details below. We will attempt to confirm as appropriate and necessary with you your understanding of the conduct relevant to the complaint and what you expect as an outcome.

8.4 We will inform you whether we will conduct an investigation, the name, title, and contact details of the investigating officer and the estimated completion date for the investigation process.

8.5 After we have completed our enquiries, we will contact you, usually in writing, to advise the outcome and invite a response to our conclusions about the complaint. If we receive a response from you, we will assess it and advise if we have changed our view.

## 9 Disclosure outside of Australia

9.1 We may disclose personal information to our related bodies corporate and third-party suppliers and service providers, including but not limited to social media service providers located overseas for some of the purposes listed above.

9.2 We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

## 10 Security

10.1 We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure. We may hold your information in either electronic or hard copy form.

10.2 Personal information is destroyed or de-identified when no longer needed.

10.3 As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet.



10.4 Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

10.5 We must immediately notify you in writing, and give you full details, about any actual or suspected accidental or unauthorised access to or data breach involving your Personal Information (a **Data Security Incident**) and co-operate with any investigation or audit in respect of the Data Security Incident

## 11 Third Party Links

11.1 Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third-party website, and we are not responsible for the privacy policies or the content of any third-party website.

11.2 Third party websites are responsible for informing you about their own privacy practices.

## 12. Your Right to Anonymity

12.1 Except where it isn't practical to use our website, or where the law requires otherwise, you are not obliged to identify yourself and you may elect to use a pseudonym instead of your real name when dealing with us.

## 13. Contacting us

13.1 If you have any questions about this privacy policy, any concerns, or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please use the contact link on our website or contact our Privacy Officer using the details set out below.

13.2 We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in timely and appropriate manner.

Please contact our Privacy Officer at:

Privacy Officer  
Australian War Widows NSW Ltd  
Post: PO Box 146, Chatswood NSW 2057  
Tel: (02) 9267 6577  
Email: [guild@warwidowsnsw.com.au](mailto:guild@warwidowsnsw.com.au)

## 14. Changes to our privacy policy

14.1 We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on our website. Please review it regularly.

14.2 This privacy policy was last updated in July 2022.