

# Northern Health Research, Training & Equipment Foundation Ltd

## Privacy Policy

### 1 About this Policy

This section explains how to read this policy and describes its purpose.

#### 1.1 Interpretation of this document and general overview

Defining specific terms:

- “Foundation” refers to charitable operations of the Northern Health Research, Training & Equipment Foundation Ltd.
- “Privacy information” includes personal information and sensitive information.
- “Personal information” includes information that is capable of identifying an individual such as name, address and date of birth.
- “Sensitive information” includes information relating to health or religion, racial or ethnic origin.
- “We”, “us” and “our” refer to the Foundation.
- “APPs” refer to the Australian Privacy Principles in the *Privacy Act 1988* (Cth).
- “Privacy Act” refers to the *Privacy Act 1988* (Cth)

#### 1.2 Purpose of this policy

The Foundation supports the Northern Health network by coordinating fundraising activities. In particular, the Foundation provides and manages the process for donations and philanthropic support to be allocated to teaching, training and research; education; capital works; and the purchase of medical equipment within Northern Health. As part of its activities the Foundation solicits donations and philanthropic support from a variety of sources, including patients of Northern Health, attendees at fundraising events conducted by the Foundation and other activities.

This Privacy Policy sets out how we comply with our obligations under the Privacy Act. We are bound by the APPs in the Privacy Act which regulate how we may collect, use, disclose and store personal information, and how individuals may access and correct personal information held about them.

Our Privacy Policy also informs patients, donors, volunteers, stakeholders and anyone else whose privacy information is protected in dealing with the Foundation, about how they can access their privacy information, correct privacy information held by us, lodge complaints or make any related enquiry.

#### 1.3 Dealings with us on an anonymous or pseudonymous basis

People who contact us or provide us with privacy information may use their name, remain anonymous or use a pseudonym. However we may be unable to adequately provide our services, provide access to privacy information we hold about an individual on request, handle a complaint about an alleged breach of

the APPs or otherwise deal with an inquiry or other interaction if the individual contacting us does so on an anonymous or pseudonymous basis.

## **2 Type of information we collect and hold**

The Foundation collects information about people, mainly about donors and prospective donors, which falls into all three categories of privacy information under the Privacy Act - personal information, sensitive information and health information.

We also collect personal information related to our volunteers, recruitment, corporate and other administrative functions.

You can see a list of the type of information we collect on our Collection Statements. We need this information to deliver necessary and effective services and to understand and forecast our business.

The kinds of personal information we collect depends on the reasons for interacting with the Foundation. Sections 2.1 to 2.5 of this Privacy Policy outline the types of information we may collect.

### **2.1 Supporters and donors**

- Name;
- Contact details (address, phone, email);
- Communication preferences;
- Age/date of birth;
- Gender;
- Interests;
- Bank account/credit card details;
- Donation/support history; and
- Bequest pledge details (e.g. estate value, proposed executors).

### **2.2 Volunteers**

- Name;
- Contact details (address, phone, email);
- Age/date of birth;
- Emergency contacts (name, contact details, relationship);
- Applications and selection process documents;
- Qualifications, skills, experience and employment;
- Medical conditions or health information;
- Bank account details (e.g. for reimbursements);

### **2.3 Prospective Employees**

- Name;
- Contact details (address, phone, email);
- Age/date of birth;
- Applications and selection process documents;
- Qualifications, skills, experience and employment;
- Medical conditions or health information; and
- History and records (e.g. performance assessments).

### **2.4 Website visitors**

- Server address (e.g. IP address);
- Top level domain name (for example .au, .nz, .com);
- Date and time of visit;
- Pages and documents accessed during visit;
- Previous site visited;
- Whether you've visited our site before; and
- Browser details.

### **2.5 Partners and stakeholders**

- Name;
- Contact details (address, phone, email);
- Role; and
- Connection with the Foundation.

## **3 How we collect your information**

We may collect privacy information from people through our marketing, business development, operational, human resources, research or other activities.

We have a general policy to collect privacy information directly from you, unless it is unreasonable or impracticable to do so.

We will need your written consent to collect sensitive information (which includes health information) about you.

### **3.1 Supporters and donors**

Our supporter and donor lists contain the personal information of those who express an interest in our charitable work. We use those lists to distribute information about our activities and publications, to seek donations and to

encourage further involvement with the Foundation. We may collect personal information regarding your interests to personalise your interactions with us.

If you make a tax deductible gift, we collect your personal information so that we can issue a tax deductible receipt. We must keep these types of records to comply with tax and fundraising laws. We need banking or credit card details if you want to donate funds via electronic means.

We collect personal information directly from individual supporters and donors when we meet you personally, or if you contact us by phone, by email, through social media, or in other ways. This is collected only where you express an interest in supporting the Foundation and receiving information from us. For phone, street, door knock or online campaigns, collection may occur through intermediaries (e.g. fundraising agents, website).

We occasionally obtain personal information from other organisations (e.g. charities or list suppliers) where we believe you agreed to receive direct communications/marketing. If this is not the case, please let us know immediately. We occasionally collect personal information from publicly available sources (e.g. internet).

We also collect information from patients admitted to Northern Health when the patient completes an admission form and consents to his/her information being disclosed to the Foundation.

### 3.2 **Volunteers**

We collect personal information regarding prospective and current volunteers regarding their skills, interests and experience to:

- assess their suitability to volunteer with us
- match them to suitable projects or roles.

We collect details of volunteer contributions and feedback to manage your volunteer involvement.

### 3.3 We generally collect personal information directly from the volunteer, but may also do so from referrers, referees or the Foundation's employees (where relevant to the volunteer assessment process). **Prospective Employees**

We collect personal information regarding prospective employees, regarding their skills, interests and experience to:

- assess their suitability for potential employment with us
- match them to suitable projects or roles.

We generally collect personal information directly from the prospective employee, but may also do so from fundraising agents, recruiters, referrers, referees or the Foundation's employees where relevant to the recruitment assessment process.

### 3.4 **Website visitors**

We collect information about visitors to our website for statistical purposes. However, due to the nature of internet protocols, that information might contain information which personally identifies you.

Our website uses sessions and cookies. Cookies are small text files (with no executable code) stored by a browser on your computer or device. We may also use the Foundation's cookies to manage secure access areas, multi-step forms, polls and some other functions. Our website may not work if you disable cookies on your browser.

We collect personal information from website users who wish to submit questions or post comments on our website (where available).

### **3.5 Partners and stakeholders**

We collect personal information regarding the employees, volunteers and officers of our partner and stakeholder organisations to pursue collaborative projects and matters of common interest.

## **4 Purpose for which we collect and deal with your information**

As a general principle, we only use privacy information for the primary purpose for which we collect the information or a secondary purpose related to the primary purpose for which you would reasonably expect us to use the collected information.

We will make you aware of the purpose for which we collect your information by notifying you about all the relevant matters of that collection.

We will not use your information for an unrelated secondary purpose unless we obtain your written consent or an exception applies, such as it is impracticable to obtain your consent and we believe that collecting, using or disclosing your information is necessary to lessen a serious threat to the life, health or safety of any individual.

### **4.1 Supporters and donors**

We only use personal information of supporters and donors for distributing information about our activities and publications, to seek and process donations and to encourage further involvement with the Foundation. You may request not to receive direct marketing/communications materials from us.

If a bequest has been pledged, we use pledge details to progress receipt of the bequest in accordance with the terms of the will.

We may use supporter and donor information to produce reports and statistics regarding our fundraising efforts. The personal information for these uses will be de-identified.

### **4.2 Volunteers**

We use personal information about our volunteers to consider applications, manage their involvement with our work, and maintain a history of their contributions. We use your banking details to reimburse volunteers for expenses.

We may also invite prospective volunteers to become a supporter to receive information about the Foundation's activities. If you agree, your personal information will be placed on our supporter list. Personal information regarding your applications will not be used for any other purpose.

### **4.3 Prospective Employees**

We use personal information about our prospective employees to consider their application.

We may also invite prospective employees to become a supporter to receive information about the Foundation's activities. If you agree, your personal information will be placed on our supporter list. Personal information regarding your applications will not be used for any other purpose.

#### **4.4 Website visitors**

We use information regarding website visits to personalise your website visit or to enable remarketing website functionality.

#### **4.5 Partners and stakeholders**

We use personal information of partners and stakeholders to become a supporter to receive information about the Foundation's activities.

#### **4.6 Other purposes**

We may also use and disclose personal information for distributing information about the Foundation and its activities, making representations to Government and other agencies pertaining to the Foundation's activities and the conduct of the Foundation's internal business functions (including complying with applicable laws, complying with all audits and assessing employment applications).

### **5 Disclosure of personal information (including direct marketing)**

We will only disclose your personal information:

- for the primary purpose for which it was collected; or
- for purposes related to the primary purpose; or
- when permitted by the Privacy Act and the APPs; or
- with your consent; or
- for direct marketing; or
- when needed for law enforcement or as ordered by a court or tribunal.

In the course of our activities, we may disclose your personal information to our project partners, contractors, consultants, bank, accountants, lawyers or insurers. This is done only when appropriate and on a need-to-know basis. We take steps to ensure that those persons keep that information secure and destroy or de-identify the information when it is no longer needed, where possible.

Our technology infrastructure may make use of cloud infrastructure or servers located outside Australia. This means that we may disclose and store your personal information outside Australia, taking such steps as are reasonable in the circumstances to ensure that the overseas recipient does not breach the Privacy Act's APPs in respect of your personal information.

#### **5.1 Supporters and donors**

Where you have supplied your banking details to us and agreed to make a donation, we will provide your banking details to our bank so they can process the donation from your account.

Donor's names may be acknowledged in the Foundation's electronic or paper based publications. If a donor does not wish this practice to be applied we will act in accordance with the wishes of the donor. We will ensure a donor is given prior knowledge and has gained approval before any recognition of their donation is made public.

Donors to us may elect to be re-assigned from the database by notifying us in writing or by marking the appropriate block on our marketing or fundraising material. Such details will be re-assigned by us immediately the notification is received, provided this does not affect any legal requirements.

When a patient is discharged from Northern Health, he/she automatically agrees to be contacted by us to solicit the patient's assistance in fundraising activities. The patient will be given the opportunity to 'opt-out', in which case the Foundation will discontinue its direct marketing activities to that patient. If the patient accepts the invitation, the patient information will be sent to a telemarketing agent for donation. If a donation is received, donor information will be extracted and welcome pack sent. The pack will include monthly e-updates, annual donor survey, biannual newsletter and details on two direct marketing appeals per year; and if a donation is not received, information on monthly e-updates, annual donor survey, biannual newsletter and details on two direct marketing appeals per year will be sent inviting a donation. If no donation is received, the marketing for this patient will discontinue.

## **5.2 Volunteers**

We may disclose your personal information to referees, government authorities, qualification organisations and probity checkers where relevant to the assessment process and ongoing Foundation operations.

## **5.3 Prospective Employees**

We may disclose your personal information to referees, government authorities, qualification organisations, and probity checkers where relevant to the recruitment process.

## **5.4 Website visitors**

Your personal information may be stored on servers located outside Australia (see section 5 of this Privacy Policy).

We may also obtain website analytics services (e.g. Google Analytics) for our websites. Information and data collected by such a provider may be stored on servers worldwide.

## **5.5 Partners and stakeholders**

We may disclose your personal information to fellow partners and stakeholders to undertake collaborative projects.

# **6 Maintaining the integrity, currency and safety of your privacy information**

This section explains how the Foundation holds your privacy information, how you can access your privacy information, update your privacy information, complain about an alleged breach of the APPs or make any related enquiry.

## **6.1 Maintaining currency of your information**

The Foundation relies on accurate and reliable information to deliver necessary and effective services. If we are satisfied that any of the information we have about you is inaccurate, out-of-date, irrelevant, incomplete or misleading, or you request we correct any information, we will take reasonable steps to ensure the information held by us is accurate, up-to-date, complete, relevant and not misleading.

The practical measures by which the Foundation avoids having an incorrect record of a resident's information include asking you to complete the appropriate forms and requesting that you periodically update this information in writing.

If we disclose your privacy information that is later corrected, we will, or else you may ask us to, notify the entity that received the incorrect information about that correction.

Should we refuse to correct the information, we will explain the reasons for refusal. We will also show you the complaint procedure if you wish to lodge a formal complaint about our refusal.

## **6.2 Safety of your information**

All privacy information is securely stored using appropriate physical and/or electronic security technology, settings and applications, and by ensuring staff dealing with privacy information are trained in our privacy policies and procedures.

These policies are designed to protect privacy information from unauthorised access, modification or disclosure; and from misuse, interference and loss.

## **7 Accessing your information or lodging a complaint**

### **7.1 Accessing and correcting information**

You are entitled at any time, upon request, to access your privacy information held by us. We will respond within a reasonable time after the request is made and give access to the information in the manner requested by you, unless it is impracticable to do so. We are entitled to charge you a reasonable administrative fee for giving you access to the information requested.

Should you be refused access to your information, we will explain the reasons for refusal - any exceptions under the *Privacy Act* or other legal basis relied upon as the basis for such refusal – and, if you wish to lodge a formal complaint about our refusal, we will explain the complaint procedure.

### **7.2 Lodging a complaint**

Should you wish to complain about a potential breach of this Privacy Policy or the Australian Privacy Principles please contact our Privacy Officer.

The Privacy Officer will make good faith efforts to rectify the issue and respond within a reasonable period after the complaint is made.

**7.3 Contact details**

Privacy Officer  
Northern Health Research, Training & Equipment Foundation Ltd  
185 Cooper Street  
Epping, VIC 3076