Privacy Policy

Policy Statement

Guide Dogs SA/NT is committed to maintaining the privacy, accuracy and security of all personal information that is collected from clients, members, donors, supporters, customers and other individuals. We recognise that individuals have a right to know how their personal information is handled. We are bound by the Privacy Act 1988 and the Australian Privacy Principles (APPs) contained therein.

This privacy policy sets out how we collect, use, hold, disclose personal information, and how individuals can request access to, or correction of, personal information or make a complaint in respect of privacy matters.

All reasonable steps will be taken to protect personal information in accordance with relevant legislation, regulations and codes including the Privacy Act 1988 and the Australian Privacy Principles set out in that Act. Further information on Australian Privacy Laws can be readily found on the website of the Office of the Australian Information Commissioner, located at www.oaic.gov.au.

Guide Dogs SA/NT may update this Privacy Policy and it will be posted on our website so that all interested parties can access information about what is collected, how that information may be used, and under which circumstances it may be disclosed to other parties. A printed copy is available in both word and pdf formats. On request it can be provided in other formats to suit specific individual requirements.

Definitions

In this privacy policy:

- 'Client' means a person who receives services from us.
- 'Personal information' means information or an opinion about an identified individual or an individual who is reasonably identifiable, whether such information or opinion is true or not, and whether recorded in a material form or not.
- 'Health Information' includes information or an opinion about your health or any disability you may have now or previously, your expressed wishes about the future provision of health services to you, other personal information collected to provide or in providing a health service to you, or in connection with the donation of your organs or certain genetic information about you in a form that is or could be predictive of yours or a relative's health.
- 'Sensitive Information' includes information or an opinion about your racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information, genetic information other than health information, biometric information for automated verification or identification purposes and biometric templates.

What kinds of personal information we collect and why

The types of personal information we ordinarily collect include:

- *if we provide services to you:* your contact details and personal details such as your full name, address, phone number, email address, date of birth, Health Information (such as medications, diagnosis and treatments), NDIS identifier number, diagnostic reports, case notes (including information such as your social supports, our observations, our interventions and your responses), any powers of attorney, guardianship or care directives you may have put in place and any other details we request which are relevant to the provision of services to you;
- *if you are a guardian/attorney for a client:* your contact details and personal details which are required for us to confirm your identity and that you have authority to deal with us on our Client's behalf (such as your full name and address and a copy of your driver's licence or other form of photo identification);
- *if you are a donor or member of Guide Dogs SA/NT:* your contact details, credit and/or banking details and other details which are necessary to manage your donation or membership with us, and any other details which we may specifically request at the time you make your donation;
- *if you are a job applicant, volunteer or contractor:* your personal and contact details and your resume, your previous employment history, your tax file number (if relevant), next of kin, superannuation details, bank account details, trade or professional qualifications, proof of identity, police checks, personal and professional references and other details relevant to your application or ongoing relationship with us; and
- *for all individuals:* any other specific information which we request you provide to us from time to time in connection with our dealings with you.

We will not collect Sensitive Information (including Health Information) about you without first obtaining your consent. Unless one of the limited exemptions under the Privacy Act applies, we will only collect your Sensitive Information if you consent to such collection and if such Sensitive Information is reasonably necessary for one or more of our functions or activities.

We ordinarily collect personal information for the following purposes:

- to provide quality services to our clients
- to comply with law, including to fulfil our reporting obligations to government departments and other funding bodies
- to review, improve or expand services to support people living with disability
- to efficiently achieve fundraising objectives to support client services which would not otherwise be available through government funding
- for our internal management purposes and to manage our relationship with you
- to tell you about our services that might better service your healthcare or lifestyle requirements or other opportunities in which you may be interested
- if you are a job applicant, contractor or volunteer, to assess your potential or ongoing suitability for a position or contract with us and to, with your permission, contact professional or other reference(s) you have provided in connection with a job or volunteer application to discuss your experience/employment
- for other purposes which are reasonably necessary for our normal business functions and activities, such as our internal management purposes or to enable us to conduct our business generally.

How we collect your personal information

We generally collect personal information about you:

- directly from you or your nominated representative (for example via forms and questionnaires you complete for us or via your interactions with us or our staff, such as via our website, over the phone, via email or in person)
- from other people who are connected with providing our services to you or a client for whom you act as a guardian/attorney (for example, from government bodies or agencies, or, in the case of an emergency, your relatives or other emergency contact person).

There may also be occasions where a client's relative or family member provides information to us about the client.

If we collect your personal information over the phone using call recording, we will obtain your consent prior to activating the recording, and reconfirm that we have obtained consent once the call recording has commenced. You may ask that call recording is stopped at any stage during the conversation. We will treat the information collected during the recording in accordance with the Privacy Act 1988.

Permission for call recording must be sought through the ICT Department by the Privacy Officer to ensure Privacy Principles are followed in each instance.

How do we deal with unsolicited personal information?

We assess whether the information could be collected under APP 3 (collection of solicited personal information.) The Privacy Officer will determine whether the information should be destroyed, de-identified or retained. If retained, the information and include details of the Australian law (or, if applicable, the regulation or other instrument), or details of the particular court or tribunal order, that requires or authorises the collection of the information.

Requesting access to, or correction of, personal information

You have a right to request access to, or amendment of, personal information which we hold about you. We ask that requests be made in writing addressed to the Privacy Officer at the details set out below. We will never charge a fee for making a request for access, but there may be circumstances where we consider it necessary to charge a fee for providing access. We will advise you of this fee (if any) prior to actioning your request.

When you request copies of your personal information held by us we will endeavour to provide you with such personal information as soon as reasonably practicable after the request is made, provided however that there may be occasions when access to personal information we hold about you is denied, or only able to be provided in an alternative format. Such occasions would include where release of the information would have an unreasonable impact on the privacy of others.

We will require you to verify your identity and authority (if applicable) and specify what information you require. We will give you reasons if we deny access.

Cookies

Cookies are small files that a website transfers to your computer. Most web browsers are automatically set to accept cookies. Your browser will allow you to restrict, block or delete cookies. A cookie only contains information you supply. It cannot read data on your computer.

We use cookies:

- to collect non-identifying statistical information on:
  - how many people visit our website
  - what country/city/region they are from
  - which browser/operating system they are using
  - pages viewed on the website.
- to allow functionality for the user within our website
- for use of third party advertising or social media services to enable tracking and retargeting for online marketing material.

By using our website, you agree that we may place these types of cookies on your device.

Dealing with us anonymously

You have the option of not identifying yourself or using a pseudonym when dealing with us, unless we are required by law or a court or tribunal to deal with individuals who have identified themselves or it is impractical for us to deal with you if you have not identified yourself.

How we use and disclose personal information

Unless you consent otherwise or where we are otherwise permitted to do so by law, personal information will only be used or disclosed for the purposes for which it was provided (**primary purpose**) or for a purpose (**secondary purpose**) related to (or in the case of Sensitive Information directly related to) the primary purpose. This ordinarily includes using personal information to provide a Client with the requested services, to fulfil our legal and reporting requirements or to conduct our fundraising activities.

Some examples of when we ordinarily share personal information include:

a) with third parties in connection with our provision of services to the Client, where a Client has expressly permitted us to share their personal information with (or where permission is implied);
b) within Guide Dogs SA/NT for training and development purposes, administration, internal reporting and to support services provided to people living with disability;
c) with government agencies for statistical purposes, in a format which will not identify clients – that is, the information is no longer 'personal' information and/or for the purposes of fulfilling the terms of funding agreements underpinning client services, e.g. the Disability Services National Minimum Data Set;
d) with other government agencies for legal purposes, for example police checks;
e) where we are permitted or required to do so under law, for example where a 'duty of care' issue or legal issues exists, such as:
   - serious safety concerns for the Client;
   - serious safety concerns for others;
   - a legal requirement to provide the information to a third party, e.g. the Police;
f) with our professional advisers in connection with our business activities, including

ABN 91 183 168 093
guidedogs.org.au

Document status: Published
Approved by: Chief Financial Officer
Uncontrolled when printed

Last Review: 16/06/2025
Next Review:16/06/2027

our lawyers and auditors;

g) in marketing or fundraising communications, but only with the express permission of the Client, volunteer, staff member or supporter.

We may also use personal information for the purpose of direct marketing, including for the purpose of sending you material about our related businesses (e.g. Beau's Pet Hotel). If at any time we send you material that you no longer wish to receive, you may choose to "opt out" of receiving such material by contacting us using the contact details provided in that material or by contacting the Privacy Officer set out below.

We are not likely to disclose personal information to overseas recipients.

Accuracy, security and storage of personal information

We will take reasonable steps to ensure that the personal information we collect, use or disclose is complete and up-to-date. We have security measures in place to protect against the loss, misuse and/or alteration of information under its control.

These measures include:

- Physical files and/or information being kept in secure areas or locked storage cabinets and rooms which are not publicly accessible
- Systems and electronic files or databases being password protected and secured by a "firewall" to assist with prevention of illegal or unauthorised access to electronic records via the internet

Where a Client is no longer receiving a service from us and we no longer require no longer require such information, records containing personal information will be destroyed or de-identified, unless otherwise required by law.

How to ask a question or make a complaint in relation to privacy matters

If you have a query relating to privacy, or are of the view we have breached the Australian Privacy Principles, the Privacy Act, or any related privacy code in dealing with your personal information, you may make a complaint by writing to us using the contact details set out below and we will endeavour to provide you with confirmation as to how we propose to deal with the complaint as soon as reasonably practicable.

If you are not satisfied with our response to your complaint, you may make a complaint to the Office of the Australian Information Commissioner by visiting the following website and following the steps: https://www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint.

Privacy Officer

If you wish to request access to your personal information or make a complaint about possible breaches of privacy, please direct your enquiries to:

Human Resources Manager

251 Morphett Street, Adelaide SA 5000
Julie.Bryksy@guidedogs.org.au
p: 08 8203 8398

Employee Records

The handling of employee records is exempt from the Privacy Act if it is directly related to a current or former employment relationship. The Privacy Act only applies to an employee record if the information is used for a purpose not directly related to the employment relationship.

All employee records and personnel files will be kept securely in locked filing cabinets. In addition any electronic information access is restricted to the appropriate personnel and is password protected. All employees and volunteers can request access to their own employee records by submitting a request to HR.

In addition to this policy, we have specific internal and external policies and procedures regarding Personal Information Handling, Service Delivery, Complaint Management, Client Records Management, Infectious Diseases and Vaccination Policy, Confidentiality and Donor Privacy.