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Privacy Policy

Policy Statement

- 1.1 The Queensland Police-Citizens Youth Welfare Association ACN 009 666 193 ("PCYC", "we", "our" or "us") is a not-for-profit community organisation that seeks to achieve excellence in youth development by encouraging participation in recreational, sporting, cultural and welfare programs.
- 1.2 We respect the privacy of the personal information you may provide to us when we deal with you. The way we manage your personal information is governed by the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**) established under the Privacy Act.
- 1.3 This policy explains the types of personal information that we may collect and hold, how that information is used and with whom the information is shared. It also sets out how you can contact us if you have any queries or concerns about this information.
- 1.4 For the purposes of this Privacy Policy, "personal information" has the meaning given to it in the Privacy Act, being information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information is true or not, and whether the information or opinion is recorded in a material form or not. Examples of personal information include an individual's name, address, telephone number and date of birth.

Your acknowledgement and consent

- 1.5 By continuing to correspond with us, using our website, by providing us with personal information, you are taken to have read and understood this Privacy Policy and you have consented to us managing your personal information in the way described in this Privacy Policy

Users under 18

- 1.6 If you are aged under 18, you must obtain your parent or guardian's permission before you provide any personal information to us. Individuals without this consent are not allowed to provide us personal information. We urge parents to regularly monitor and supervise their children's on-line activities.

2. Collecting personal information

What kinds of personal information do we collect and hold?

- 2.1 The types of personal information we may collect include, but are not limited to:
 - 2.1.1 contact details and other details including:
 - 2.1.1.1 our full name (current and former), date of birth, gender and personal and/ or business contact details (including your address, landline or mobile telephone numbers, fax number and e-mail address);
 - 2.1.1.2 your business contact details (including your company name, job title and business); and
 - 2.1.1.3 contact and identification details of any third party that you have authorised to negotiate or provide your personal information on your behalf (including any attorneys appointed by you under a power of attorney);
 - 2.1.2 information about you as a customer/ member of PCYC including:
 - 2.1.2.1 any programs, services or products you purchased from us;
 - 2.1.2.2 information about your visit to our website, such as your browser software, which pages you view and which items you "clicked" on or added to your shopping basket;
 - 2.1.2.3 program, service, product or participation logs, which hold information about your use of our programs, services, products or websites;
 - 2.1.2.4 interests and preferences that you specify during participation in a program or service; and
 - 2.1.2.5 commentary or opinion you provide relating to our services/ products;
 - 2.1.3 banking and payment details including, bank account and credit card information, and any other information required for us to process donations and other transactions associated with our services;
 - 2.1.4 any correspondence between you and PCYC; and
 - 2.1.5 any other personal information provided to us when you make an inquiry or request information.

Sensitive Information

- 2.2 We may also collect sensitive information from you.
- 2.3 Sensitive information is defined by the Privacy Act to be certain kinds of personal information which is subject to stricter controls. Examples of sensitive information that we may collect from you through providing information and other services to you include:

2.3.1 health and medical information; and

2.3.2 criminal history.

- 2.4 We will only collect sensitive information about you with your consent and if the sensitive information is reasonably necessary for our functions and activities. If we receive any sensitive information about you, we will handle it in accordance with this Privacy Policy, the Privacy Act and the APPs.

How do we collect personal information?

- 2.5 PCYC may collect personal information which is necessary for our programs and activities in several different ways. Please take care when submitting personal information to us, in particular when completing forms and other materials.

- 2.6 Where possible, we will always try to collect personal information directly from you - for example when you:

2.6.1 request information or contact us through our website or by telephone;

2.6.2 complete a membership application form or participate in a program or activity organised by us;

2.6.3 correspond with us in writing (such as letters and emails);

2.6.4 provide your identification or other documents to us; or

2.6.5 meet with us in person.

- 2.7 We may also obtain your personal information from third parties we deal with, such as:

2.7.1 our partner organisations;

2.7.2 government and law enforcement agencies;

2.7.3 our professional advisers;

2.7.4 our contracted service providers for (example, fundraising service providers); and

2.7.5 any other organisation with whom we do business.

- 2.8 Where we collect personal information from third parties you refer to us, we will assume, and you should ensure, that you have made that third party aware of the referral and the purposes of collection, use and disclosure of the relevant personal information.

- 2.9 If you are asked to provide details about other people, please ensure that these individuals are happy for their details to be given to PCYC and used for the purposes set out in this Privacy Policy (which may include using their details for marketing purposes).

3 Dealing with us anonymously

- 3.1 Whenever it is lawful and practicable, you will have the option of not identifying yourself when dealing with us. For example, general access to our website does not, and general telephone queries do not, require you to disclose personal information about yourself.

However, there are parts of our website where we may need to collect personal information from you for a specific purpose - for example, to register you for any activities and events that we organise.

4 Why do we collect, hold, use and disclose personal information?

- 4.1 We need to collect personal information from you in order for us to provide programs and services. Our activities include carrying out our programs and fundraising activities as well as providing the community with access to our clubs, gyms and school-age care facilities.

- 4.2 If you do not provide some or all personal information requested, we may not be able to offer you services or provide you with information about our causes, events, programs and projects.

- 4.3 We may collect, use and disclose your personal information in order to:

4.3.1 respond to your requests or inquiries;

4.3.2 provide you with the services, products and information you request. For example, providing you with information in relation to our gym memberships;

4.3.3 promote PCYC and its services and upcoming events;

4.3.4 provide marketing materials, events, special offers, competitions and promotions via any medium including mail, telephone and electronic messages or any other form of electronic, emerging, digital or conventional communication channels;

4.3.5 obtain opinions or comments about programs and/or services and to conduct other market research and development (including to record statistical data for marketing analysis);

4.3.6 enable you to become a PCYC member;

4.3.7 maintain our relationship with you and to communicate with you during the course of your relationship with us;

4.3.8 fulfil obligations in respect of any program, activity or service and/or any other contract between you and PCYC;

4.3.9 notify you about changes to our functions, activities, services or our website and improving our customer services (for example, using customer feedback to improve our website's ease of use and efficiency);

4.3.10 administer, support, improve and develop our organisation, services and activities;

4.3.11 update and maintain our records - for example, account management and administration records;

4.3.12 if you lodge a complaint with us - process and respond to your complaint;

4.3.13 any other purpose which relates to or arises out of requests made by you;

- 4.3.14 if you lodge a complaint with us, processing and responding to your complaint;
 - 4.3.15 do anything which you authorise or consent to us doing; and
 - 4.3.16 take any action we are required or authorised by law to take.
- 4.4 PCYC will not sell, trade or rent personal information we hold about you to unaffiliated third parties without your prior consent.

5 Disclosing your personal information

- 5.1 In carrying out our functions and activities set out above, we may disclose your personal information to the following:
- 5.1.1 our business partners, stakeholders and service providers (including Federal and State Government bodies, and contractors who may provide website, IT, marketing, administration and other services to support PCYC.);
 - 5.1.2 our professional advisers (for example, our insurers, auditors, lawyers and consultants);
 - 5.1.3 third parties we engage to carry our promotions or other activities you have requested, or for direct marketing purposes (unless you have opted-out of direct marketing communications);
 - 5.1.4 any entity to whom we are required or authorised by law to disclose your personal information (for example, law enforcement agencies and government and regulatory authorities);
 - 5.1.5 any successors in title to our organisation or functions and activities; and
 - 5.1.6 other entities with your consent (express or implied).
- 5.2 The above entities may in turn disclose your personal information to other entities as described in their respective privacy policies or notices.
- 5.3 We may prepare anonymous, aggregated or generic data (including "generic" statistics) for a number of purposes, including for program and service development, business promotion and research purposes. This is anonymous data and not personal information and we may share it with any third party (such as our partners, advertisers, industry bodies, the media and/or the general public).

6 Direct Marketing

- 6.1 If you consent to your personal information being used for direct marketing, we may use your personal information to provide you with information about products, fundraising activities, services and promotions. This includes newsletters and other communications by post, email, telephone and/or text message (SMS) from PCYC, sending you details about the latest PCYC programs and services, such as upgrades and special offers in which you may be interested.
- 6.2 PCYC may also give you the opportunity to opt-in to receiving more targeted direct marketing communications.
- 6.3 If you do not wish to receive such information, you can opt-out at any stage. For example, if you would like to unsubscribe from an email sent to you, you can follow the "unsubscribe" link and/or instructions placed (typically) at the bottom of the email. But note that:
- 6.3.1 if you send more than one email address to shop or contact PCYC, you will need to unsubscribe in respect of each email address; and
 - 6.3.2 this method will only unsubscribe for the newsletter or other communication that you have received and you should use one of the other methods as specified on the direct marketing materials if you wish to opt-out of all our marketing communications. You can also contact us at the contact details below if you do not wish to receive direct marketing communications.
- 6.4 If you decide to opt-out, you will be removed from PCYC's marketing database to ensure that you do not receive future direct marketing material.
- 6.5 There may be times, however, when the law requires us to provide certain information to you (for example health and safety information). We will continue to send this.

7 Overseas disclosure of personal information

- 7.1 From time to time, PCYC may engage service providers located in overseas countries to perform certain functions and activities. In the course of providing services to PCYC, we may need to disclose your personal information to these service providers. We currently send your personal information to New Zealand and Papua New Guinea in connection with overseas trips conducted by PCYC personnel. If personal information is sent overseas, we will take reasonable steps to ensure that our service providers are carefully chosen and have policies, procedures and systems in place to ensure your personal information is otherwise handled in accordance with the Privacy Act.

8 Dealing with PCYC online

- 8.1 This Privacy Policy applies to your use of our website (<http://pcyc.org.au/>) and related websites that PCYC may create from time to time and any personal information that you may provide to us via these sources.
- 8.2 When you visit our website, we and/or our contractors may collect certain information about your visit. Examples of such information may include:

8.2.1 Cookies

Cookies are small amounts of information which we may store on your computer (after you register on our website) to enable our server to collect certain information from your web browser. Cookies do not identify the individual user, just the computer used. Cookies and other similar technology make it easier for you to log on to and use the website during future visits. They also allow us to monitor website traffic, to identify you when you visit our website, personalise website content for you, enable you to both carry out transactions and have access to information about your account. Cookies themselves only record which areas of the site have been visited by the computer in question, and for how long. Allowing us to create a cookie does not give us access to the rest of your computer and we do not use cookies to track your online activity once you leave our site. Cookies are read only by the server that placed them, and are unable to execute any code or virus.

8.2.2 Site visit information

We also collect general information about your visit to our website. The information we collect is not used to personally identify you, but instead may include your server address, the date and time of your visit, the pages you accessed and the type of internet browser you use. This information is aggregated and used for the purposes of system administration, to prepare statistics on the use of our website and to improve our website's content.

- 8.3 Our website may also contain links to other websites which are outside our control and are not covered by this Privacy Policy. If you access other websites using the links provided, the operators of these websites may collect information from you which will be used by them in accordance with their privacy policy, which may differ from ours.

9 Social media

- 9.1 A number of our online services allow you to upload and share messages, photos, video and other content and links with others and/or create a publically accessible profile for your account. For example:

9.1.1 the forums area of our website and social media sites, allows you to post comments (with your account name), which are visible to other users of that service;

9.1.2 our Facebook account; and

9.1.3 other services which allow you to share a link which if clicked on may allow the recipient to access your uploaded content.

- 9.2 You should not expect any information that you make available to others via PCYC's online services to be kept private or confidential. Content and links that you share might, for instance, be forwarded by your recipients to others. You should always exercise discretion when using such services.

10 Personal information storage and security arrangements

- 10.1 We take reasonable steps to protect your personal information from interference, loss, misuse, unauthorised access, modification or disclosure. We may store your personal information in different forms, including in hardcopy and electronic form. We have established policies, procedures and systems to keep your personal information secure - including but not limited to password protection and securing physical storage arrangements.
- 10.2 When we no longer require your personal information, we will take reasonable steps to destroy, delete or de-identify your personal information in a secure manner. However, we may sometimes be required by law to retain certain personal information.

11 Accessing and correcting your personal information

Correcting your personal information

- 11.1 So that we can carry out our activities and functions, it is important that the personal information we hold about you is complete, accurate and up to date. At any time while we hold your personal information, we may request that you inform us of any changes to your personal information. Alternatively, if you believe that any of the personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading or needs to be corrected or updated, please contact us using our Contact Details below. We will respond to a request to correct your personal information within a reasonable time.
- 11.2 If we refuse to correct your personal information, you may request that we associate with the information a statement that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading.

Accessing your personal information

- 11.3 You may also request access to the personal information we hold about you by contacting us using our Contact Details provided below. We will respond to a request for access within a reasonable time - either by giving you access to the personal information requested, or by notifying you of our refusal to give access.

Access and correction arrangements generally

- 11.4 We may require you to submit your requests in writing and require that you verify your identity before we respond to any request.
- 11.5 We will not charge you an application fee for making a request to access the personal information we hold about you or for requesting any correction to your personal information. However, in certain circumstances we may

charge you a fee for providing you with access to your personal information, for example if you make multiple request for information, the information requested is voluminous or we incur third party costs in providing you with access to your personal information.

- 11.6 If we cannot respond to you within a reasonable time (generally within 30 days), we will contact you and provide a reason for the delay and an expected timeframe for finalising your request.
- 11.7 Please note that in certain circumstances, we are permitted by law to refuse to provide you with access to your personal information. If we decide not to provide you with access to or correct your personal information, we will provide you with written reasons for our decision and advise you of the further complaint mechanisms available to you.

12 Lodging a Complaint

- 12.1 If you have a complaint about how we handled your personal information or about any decision to refuse access or correction of your personal information, please contact us using the Contact Details below. We will request that you lodge your complaint in writing.
- 12.2 We will acknowledge receipt of your complaint as soon as possible after receiving your written complaint. We will then investigate the circumstances of your complaint and provide you with a response within a reasonable timeframe.
- 12.3 If you are still not satisfied with how your complaint is handled by us, then you may lodge a formal complaint with the Office of the Australian Information Commissioner at:
 - 12.3.1 **Telephone:** 1300 363 992 (if calling from outside Australia including Norfolk Island please call: +61 2 9284 9749)
 - 12.3.2 **National Relay Service:**
 - 12.3.2.1 TTY users phone 133 677 then ask for 1300 363 992
 - 12.3.2.2 Speak and Listen users phone 1300 555 727 then ask for 1300 363 992
 - 12.3.2.3 Internet relay users connect to the National Relay Service then ask for 1300 363 992
 - 12.3.3 **Post:** Office of the Australian Information Commissioner, GPO Box 5218, SYDNEY NSW 2001
 - 12.3.4 **Fax:** +61 2 9284 9666
 - 12.3.5 **Email:** enquiries@oaic.gov.au
 - 12.3.6 **Website:** <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>

13 Our Contact details

- 13.1 If you wish to contact us regarding our handling of your personal information or any of the matters covered in this Privacy Policy, you may do so in a number of ways.
- 13.2 You may contact us on:
 - 13.2.1 **Telephone:** (07) 3909 9555
 - 13.2.2 **Post:** OPCYWA Privacy Officer, PO Box 3445, Tingalpa DC QLD 4173
 - 13.2.3 **Fax:** (07) 3909 9533
 - 13.2.4 **Email:** privacy@pcyc.org.au
 - 13.2.5 **Website:** www.pcyc.org.au/

14 Changes to our Privacy Policy

- 14.1 We welcome your questions and any suggestions you may have about our Privacy Policy.
- 14.2 We reserve the right to revise or supplement this Privacy Policy from time to time. Any updated version of this Privacy Policy will be posted on our website www.pcyc.org.au/ and will be effective from the date of posting. You should bookmark and periodically review this page to ensure that you are familiar with the most current version of this Privacy Policy so that you remain aware of the way we handle your personal information.
- 14.3 This Privacy Policy was last updated on 25 July 2014.

Version No	
Summary	This Policy provides information regarding privacy within PCYC
Created By	GM People
Approved By	EMT
Issue Date	July 2014
Effective Date	July 2014
Review Date	July 2015