

Policy Number	Version	Approval Date	Category	Owner
BPO-IMS-SW0-002	3.3	15/12/2020	Information Management & Security	Board
Board Policy Statement				
<b>Purpose</b>	This policy describes 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.			
<b>Scope</b>	This policy applies to all personal and sensitive information obtained by Queensland Police-Citizens Youth Welfare Association (PCYC Queensland).			

## 1.0 Principles

Queensland Police-Citizens Youth Welfare Association ACN 009 666 193 ("**PCYC Queensland**", "**we**", "**our**" or "**us**") respects 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 (**APP**) established under the Privacy Act.

## 2.0 Collecting Information

### 2.1 Personal Information

*Personal information* means information or an opinion about an identified individual, or an individual who is 'reasonably identifiable'; whether the information is true or not and recorded in a material form or not.

What kinds of personal information do we collect and hold? The types of personal information we may collect include, but are not limited to:

#### Contact details and other details including:

- your 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);
- your business contact details (including your company name, job title and business, address, landline or mobile telephone numbers, fax number and email; and
- 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);

#### Information about you as a customer/member of PCYC Queensland including:

- any programs, services or products you purchased from us
- information about your visit to our website or other social media (or any other form of electronics, emerging, digital or conventional communication channels), such as your browser software, which pages you view and which items you "clicked" on or added to your shopping basket
- program, service, product or participation logs, which hold information about your use of our programs, services, products or websites
- interests and preferences that you specify during participation in a program or service and
- commentary or opinion you provide relating to our services/ products

**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**  
**Surveillance camera footage** from PCYC Queensland clubs and gym + fitness facilities.

**Photographic and/or videography images** from PCYC Queensland programs, activities or events.

**Any correspondence** between you and PCYC Queensland; and

**Any other personal information** provided to us when you make an inquiry or request information

## 2.2 Sensitive Information

We may also collect sensitive information from you. 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 may include:

- health and medical information;
- sexual orientation;
- ethnic and cultural background; and
- criminal history

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.

## 2.3 Employment Information

PCYC Queensland will collect additional information that is required for functions related to your employment. Information may include, but is not limited to:

- Photo Identification
- Tax File Number
- Bank account details
- Superannuation account details
- Drivers Licence
- Blue Card status
- Police Check Information (obtained via Australian Criminal Intelligence Commission)

## 2.4 Users under 18 years old

We collect personal information about children and young people under the age of 18 in order to deliver programs and services.

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, unless deemed an independent by a government organisation.

## 3.0 Your acknowledgement and consent

By continuing to correspond with us, using our website or 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.

## 4.0 How do we collect personal information?

PCYC Queensland may collect personal information which is necessary for our programs and activities in several different ways. The kind of personal information we may collect from you will depend on what type of interaction you have with us.

Please take care when submitting personal information to us, in particular when completing forms and other materials.

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

- request information or contact us through our website or by telephone
- complete a membership application form or participate in a program or activity organised by us
- sign up to our mailing list / newsletter via our website
- donate to PCYC Queensland through our website or other social media, by telephone or in person
- correspond with us in writing (such as letters and emails)
- interact or follow our social media pages (such as Facebook, Twitter, LinkedIn, Instagram, YouTube or Vimeo)
- provide your identification or other documents to us
- meet with us in person

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

- our partner organisations
- government and law enforcement agencies
- our professional advisers
- our contracted service providers for (example, fundraising service providers)
- any other organisation with whom we do business

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.

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 Queensland and used for the purposes set out in this Privacy Policy (which may include using their details for marketing purposes).

## 5.0 Dealing with Us Anonymously

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 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.

## 6.0 Why Do We Collect, Hold, Use and Disclose Personal Information?

We need to collect personal information from you in order for us to provide programs, activities 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 outside school hours care services.

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

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

- respond to your requests or enquiries

- provide you with the services, products and information you request. For example, providing you with information in relation to our gym memberships
- promote PCYC Queensland and its services and upcoming events
- provide marketing communication and fundraising 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
- 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)
- enable you to become a member of PCYC Queensland
- maintain our relationship with you and to communicate with you during the course of your relationship with us
- fulfil obligations in respect of any program, activity or service and/or any other contract between you and PCYC Queensland
- 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)
- administer, support, improve and develop our organisation, services and activities
- update and maintain our records - for example, account management and administration records
- fulfil any other purpose which relates to or arises out of requests made by you
- process and respond to a complaint you have made
- do anything which you authorise or consent to us doing
- take any action we are required or authorised by law to take

PCYC Queensland will not sell, trade, or rent personal information we hold about you to unaffiliated third parties without your prior consent.

PCYC Queensland will only disclose your personal information to third parties required to provide a function related to your employment. This does not include Police Information obtained through a pre-employment checks which will not be disclosed to any third parties.

## 7.0 How We Store Your Personal Information and Security Arrangements

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 secure technical access and infrastructure, password protection and secure physical storage arrangements.

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.

## 8.0 Disclosing Your Personal Information

In carrying out our functions and activities set out above, we may disclose your personal information to the following:

- 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 Queensland.)
- our professional advisers (for example, our insurers, auditors, lawyers and consultants)
- third parties we engage to carry out promotions or other activities you have requested, or for direct marketing and fundraising purposes (unless you have opted-out of direct marketing communications)
- 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)
- any successors in title to our organisation or functions and activities
- other entities with your consent (express or implied)

The above entities may in turn disclose your personal information to other entities as described in their respective privacy policies or notices.

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).

PCYC Queensland may use third party systems for the collection, aggregation and analysis of survey or consultation data, and will do so in accordance with the Australian Privacy Principles.

## 9.0 Direct Marketing

If you consent to your personal information being used for direct marketing, we may use this 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 Queensland, sending you details about the latest PCYC Queensland programs and services, such as upgrades and special offers in which you may be interested.

Email marketing communications you receive may be trackable (for example allowing us to determine if the email has been opened, forwarded on or links clicked). This information allows us to assess the effectiveness of our communication.

PCYC Queensland may also give you the opportunity to opt-in to receiving more targeted direct marketing communications.

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:

- if you send more than one email address to shop or contact PCYC Queensland, you will need to unsubscribe in respect of each email address
- 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.

If you decide to opt-out, you will be removed from PCYC Queensland's marketing database to ensure that you do not receive future direct marketing material. 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.

## 10.0 Overseas Disclosure of Personal Information

From time to time, PCYC Queensland may engage service providers located in overseas countries to perform certain functions and activities. In the course of providing services to PCYC Queensland, we may need to disclose your personal information to these service providers. For example, arranging overseas trips in relation to PCYC Queensland approved programs or activities. If your personal information will be 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 1988. Those undertaking overseas trips through PCYC Queensland may request further details on the countries where PCYC Queensland may disclose your personal information.

## 11.0 PCYC Queensland Website and Social Media

This Privacy Policy applies to your use of our website (<http://pcyc.org.au/>) and related websites that PCYC Queensland may create from time to time and any personal information that you may provide to us via these sources.

When you visit our website, we and/or our contractors may collect certain information about your visit.

Examples of such information may include:

### **Cookies**

Cookies are small amounts of information stored on your computer to enable our server to collect certain information from your web browser. Cookies do not identify the user, just the computer used. Cookies allow us to monitor website traffic, to identify your computer when you visit our website, personalise website content for you and enable you to carry out transactions and complete subscription forms securely.

Cookies themselves only record which areas of the website have been visited by your computer, for how long and if/when you return to our website. Cookies are read only by the server that placed them and are unable to execute any code or virus.

Most web browsers are set to accept cookies and by visiting our website, we assume you agree to this usage. If you would do not wish to receive any cookies, you may change your browser preferences. However, this may mean that in future, your use of our website may be impaired.

We may use external service providers to measure site performance and for analytics purposes, including but not limited to, Google Analytics and Google Ad Services.

### **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.

We use tracking pixels, which are snippets of html code, on our website, social profiles and email newsletters to analyse user behaviour. This information is used for remarketing purposes across various online networks.

### **Third Party Links**

Our website, social media profiles or blog posts may also contain links to other websites and social media networks which are outside our control and are not covered by this Privacy Policy. These links are available for your convenience only. 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.

## **12.0 Accessing and Correcting Your Personal Information**

### **Correcting your personal information**

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.

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**

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.

### **Making a request**

We may require you to submit your requests in writing and require that you verify your identity before we respond to any request.

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 requests for information, the information requested is voluminous or we incur third party costs in providing you with access to your personal information.

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.

Please note that in certain circumstances, we are permitted by law to refuse to provide you with access to your personal information. For example, if the request is submitted by a person other than you, without providing evidence that the request is legitimately made on your behalf, the request will be rejected. 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.

## 13.0 Enquiries

We want to hear from you. If you have an enquiry or concern about privacy matters, including complaints about how PCYC Queensland handles your personal information or about any decision in relation to the management of requests to access or modify your personal information, please contact us using the Contact Details below.

All enquiries should be made in writing. We will acknowledge receipt of your enquiry as soon as possible.

**We will then investigate and provide you with a response within a reasonable timeframe.**

The Privacy Policy is available on the PCYC Queensland [website](#); however, you can request a copy using one of the contact methods in *15.0 Contact Us*.

## 14.0 Lodging a Complaint

If you are not satisfied with how your enquiry is handled by us, then you may lodge a formal complaint with the Office of the Australian Information Commissioner at:

- **Telephone:** 1300 363 992
- **National Relay Service:**
  - TTY users phone 133 677 then ask for 1300 363 992
  - Speak and Listen users phone 1300 555 727 then ask for 1300 363 992
  - Internet relay users connect to the National Relay Service then ask for 1300 363 992
- **Post:** Office of the Australian Information Commissioner, GPO Box 5218, SYDNEY NSW 2001
- **Email:** [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)
- **Website:** <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>

## 15.0 Contact Us

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.

You may contact us on:

- **Telephone:** (07) 3909 9555
- **Post:** QPCYWA Privacy Officer, PO Box 985, Slacks Creek QLD 4127
- **Email:** [privacy@pcyc.org.au](mailto:privacy@pcyc.org.au)
- **Website:** [www.pcyq.org.au/](http://www.pcyq.org.au/)

## 16.0 Changes to our Privacy Policy

We welcome your questions and any suggestions you may have about our Privacy Policy. We reserve the right to revise or supplement this Privacy Policy from time to time.

Annual reviews of this policy will take place and any updated version of the Privacy Policy will be posted on our [website](#) and will be effective from the date of approval.



Supporting Information			
<b>Legislative Compliance and External references</b>	<a href="#">Privacy Act 1988</a> Australian Privacy Principles (APPs) <a href="#">Right to Information Act 2009</a> <a href="#">Spam Act 2003</a> <a href="#">Information Privacy Act 2009</a> <a href="#">Education and Care Services Act 2013</a> <a href="#">Privacy (Australian Government Agencies – Governance) APP Code 2017</a> Australian Criminal Intelligence Commission (ACIC) Agreement		
<b>Parent Document (Policy)</b>	Information Management & Security Policy BPO-IMS-SW0-001		
<b>Related Documents</b>	HR Information Security Policy POL-IMS-HRM-001 Conflicts of Interest BPO-CPL-SW0-002 Code of Conduct BPO-POC-SW0-002 Complaints and Feedback Policy POL-PSE-SW0-002 Social Media Policy POL-REP-SW0-002		
Document Control			
<b>Owner</b>	Board	<b>Next review due:</b>	15/12/2021
<b>Approved by</b>	CEO	<b>Approval Date:</b>	15/12/2020
<b>Endorsed by</b>		<b>Endorsement Date:</b>	

Revision History			
Version	Amended by	Date	Revision Description
1.1	Policy Officer	01/06/2017	Revision review
2.0	Policy Officer	20/11/2018	Alignment with new policy framework structure
3.0	Policy Officer	15/10/2019	Minor amendments regarding employment information and marketing
3.1	Policy Officer	29/10/2020	Minor formatting changes and Annual Review
3.2	Policy Officer	13/07/2021	Change State Office mailing address
3.3	Policy Officer	01/09/2021	Approved by Acting COO Add information regarding use of third parties overseas for survey data.