

OUR PRIVACY POLICY

OCTOBER 2021

1. Purpose

Launchpad cares about protecting your privacy and is required by law to comply with the Privacy Act 1988 (Cth) (the Act), including the Australian Policy Principles (APPs). We take our privacy obligations seriously and the Policy outlines our privacy practices. It explains how:

- (a) We collect, manage, use, store, and secure your personal information
- (b) You may access and request correction of any record containing your personal information
- (c) You may make a complaint about a breach of privacy.

2. Scope

This policy applies to our staff, volunteers, contractors, and suppliers who handle personal information collected by Launchpad Youth Community Inc. and its related entities from time to time.

It applies to personal information for individuals that are external to us such as donors, clients, and suppliers.

By providing your personal information to us, you consent to the use, storage, and disclosure of the personal information you provide as described in this Policy.

3. How we manage your personal information

We will:

- Take all reasonable steps to ensure we are open and transparent about the way we manage your personal information
- Maintain adequate security of personal information to seek to protect it from misuse, interference and loss from unauthorised access, modification, or disclosure
- Establish reporting channels to receive privacy inquiries from you and from reports of privacy breaches to be received and acted upon
- Conduct risk assessment for all new and significant business projects which consider privacy impacts
- Provide an option for you to use a pseudonym or otherwise be anonymous unless it is impermissible, impractical or inhibits the adequacy or quality of services provided to you
- Provide relevant work training and privacy awareness on how the APPs apply to us and how they are reflected in privacy practices, procedures, and systems
- Periodically review this Policy as well as the privacy practices, procedures, and systems across our organization to ensure that they remain appropriate to the changing environment we operate in and will notify you by, informing you in our regular communications or posting an updated version of this Policy on our Website.

4.1 Personal information we collect and hold

We will collect information about you that is reasonable and necessary for our functions or activities which are listed under 4.3. This may include:

- Your name, address, contact and bank and credit card details for clients, volunteers, suppliers, and donors
- Your image, video, and sound recordings
- Information associated with web browsing, email, text messaging, phone calls or other electronic interaction with you including your phone number and username
- For donors, details relating to your donations and information relevant to the purpose of better identifying donor sources

- For others, other information relevant to the purpose of providing services such as family and living circumstances, education and qualifications, employment history, financial information including income, names and passwords, guardianship and service feedback and complaints details
- Sensitive information about you that may include your age, date of birth, gender identity, sexuality, health, disability, mental health, racial or ethnic origin, criminal convictions, religious affiliation, tax file number, and other particulars required as part of our funding obligations and/or that are relevant for the proper provision of services
- Survey and question responses.

4.2 How we collect and hold personal information

Where possible personal information is collected directly from you with your consent at the time of your interaction with us. In some services, personal information is:

- Received from third parties where you are transferred or referred to us for the services that we provide
- Received from third parties who obtain your personal information from publicly available sources or
- Transferred between our own services provided it relates to the primary purpose for which it was collected.

Personal information may be collected in a hard copy form or electronic form. Hard copy records are required to be held securely. We hold electronic records in databases with security safeguards. Some of those databases are government controlled while some are held by a third party provider.

Where consent for collection is sought, it is sought voluntarily from you, and we will inform you of what you are consenting to. Our consent agreements are current and specific to the services provided to you.

We will not collect sensitive information about you unless you have consented, it is required by law, or in special specified circumstances, for example relating to health services provision and individual public health or safety.

4.3 Purpose for which we collect, use, and disclose personal information

We collect, hold, and use personal information only for the primary purposes for which it is collected as set out below including:

- To provide services which may include case management, housing support, employment services, counselling, education, volunteering, learning and development and fundraising.
- To comply with the requirements of funding bodies as part of a funding agreement with us
- To operate fundraising activities in support of our objective
- To provide customer service functions, including handling customer enquiries, complaints, and feedback
- To facilitate proper governance processes such as risk management, incident management, internal audit, and external audits
- To gather feedback from you and other individuals about the quality of services that we provide so that the services we provide can be continuously improved
- To undertake marketing, fundraising and promotional activities, including activities to better identify donor sources, events and conferences organised and held by us
- To satisfy legal obligations, comply with applicable laws and meet the requirements of the bodies which regulate the services we provide
- To understand, through aggregated information, trends, and patterns which we use for research and advocacy
- To fulfill other purposes which you have consented to.

4.4 Disclosure to third parties

We will not disclose your personal information to other external organisations except:

- As required by funding agreement
- As required by law

- For transfer to another service provider in accordance with funding agreements
- Where we have your consent to do so through your acceptance of this Policy and the disclosure related to the goods and services we provide to you
- For a purpose permitted by this Policy or
- If you request us to do so.

Examples of organisations and/or third parties that your information might be provided to include:

- Service providers where you are transferring to a service provider that is not part of us
- A government agency, as required by our funding agreement
- Third party service providers who assist us with the delivery of services, or undertaking quality assurance of our services
- Third party providers who assist us with fundraising activities or strategy, identifying donor sources or analysis of our fundraising activities, strategy, or patterns (including data collectives)
- Government and non-government agencies where we have a reasonable concern regarding your safety or wellbeing
- Third parties who collate and/or analyse information for the purposes of research and advocacy
- Third parties for the electronic storage of information, some of which may be overseas.

Whilst we seek to ensure through our contracts with external parties that they comply with the Act regarding the use of your personal information, we have limited control around how some external parties (for example, government agencies) use your personal information.

5 How you can access and correct your personal information

5.1 Access

You are entitled to request access to the personal information held by us about you. This is generally provided upon your request. Requests are made to the same point of contact to whom you provided your personal information.

5.2 Correction

Where you inform us that information held by us about you is accurate, out-of-date, incomplete, irrelevant or misleading, we will correct it where we agree with you. Notices by you to us to amend information held about you are made at the same point of contact to whom you provided your personal information.

If, having received and considered an application from you to amend your information, we do not consider that the information should be amended, we will not amend it but we will include a note with the information that you consider that it should be amended, and advise you accordingly.

6 Overseas disclosure

We may store personal information that we collect about you with third parties who store it overseas for our use. We do not disclose personal information about you overseas without your consent. However, we may use overseas or cloud-based data hosting facilities which may result in personal information provided to us being transferred to, and stored at, a destination outside Australia.

You are taken to expressly and freely consent to the transfer, storing and processing of your personal information outside of Australia in submitting it to us. In providing consent, you understand and acknowledge the countries outside of Australia do not always have the same privacy protection requirements of Australia in relation to personal information.

If you do not agree to the transfer of your personal information outside Australia, you should contact the Launchpad Executive Officer at:

Email: secretary@launchpadyouth.org.au

Phone: 02 9557 2810

Post: Executive Officer PO Box 23, St Peters 2044.

7 Retention of personal information

We will retain your personal information in accordance with applicable laws or requirements of any government or other funding body's record keeping requirements.

8 Mandatory notifiable data breaches

We will comply with the notification and other requirements of the Act where your personal information held by us has been inadvertently lost or disclosed or improperly accessed and that loss, disclosure or access may result in serious harm to you.

9 What to do if you have a privacy enquiry or complaint

If you have any enquiry or a complaint concerning collection, use or management of your personal information, please direct your enquiry or complaint to the staff member who is your ordinary contact. Our staff will outline options regarding how your enquiry or complaint may be resolved. We will aim to respond and resolve your enquiry or complaint in a timely and appropriate manner, if we don't, you may take it to more senior management.

We will treat your enquiry or complaint confidentially. You may contact the Australian Information Commissioner whenever you believe that your rights or privacy have been breached by us.