



Privacy Policy

Returned Services League of Australia (S.A. Branch) Darwin Sub Branch
(ABN 93 873 449 244)

Our Approach to Privacy

This Privacy Policy explains how the Returned Services League of Australia (S.A. Branch) Darwin Sub Branch (ABN 93 873 449 244) (ACNC Registered) (**RSL Darwin or We**) collects, makes use of, stores and discloses personal information in providing its products and services to the community.

RSL Darwin is bound by the *Privacy Act 1988* (Cth) (the **Act**) and the Australian Privacy Principles (the **APP**). The APPs apply to the handling of personal information and follow the personal information lifecycle from collection, to use, to disclosure, to retention, to destruction or de-identification. RSL Darwin is an APP entity as defined in s 6(1) of the Act.

RSL Darwin is committed to respecting privacy of all personal information it deals with in providing its products and services to future and present members, volunteers, donors, beneficiaries, the community, the general public, employees, office holders, contracted persons and other third parties.

We may modify this policy from time to time by publishing updates to it on our website. We encourage you to check our website periodically to ensure you are aware of our current privacy policy.

If you have any questions or feedback about this policy or the way in which RSL Darwin handles personal information, you can contact us. A hard copy of the Policy may be requested from the Privacy Officer. Details of the Privacy Officer are contained at the end of the policy.

What is Personal Information?

Personal Information is information or an opinion about an identified individual or a reasonably identifiable individual. Such information or opinion is still personal information irrespective of whether the information or opinion is true or not.

What Personal Information do we collect?

We collect personal information about future and present members, volunteers, donors, beneficiaries, the community, the general public, employees, office holders, contracted persons and other third parties members.

The types of personal information we may collect depends on the purpose for which we need the information and may include the following details:

- contact details such as street and postal address, phone number, email and/or date of birth
- a person's name or signature or mark
- next of kin and emergency contact information

- financial, tax and credit information
- medical, dietary, disability, psychological and service history
- proof of identity information and documentation including drivers licence, passport or birth certificate information
- IP address, browser type, domain names, browsing preferences, access times and the addresses of referring websites
- information concerning your dealings with the Department of Veterans' Affairs, Defence Force and other Government bodies and institutions
- RSL membership number
- photographs, videos and event content
- other information or opinion that reasonably identifies you as an individual.

Do we collect Sensitive Personal Information?

We may collect your sensitive information when we have your consent and when the collection is reasonably necessary for us to carry out one or more of our functions or activities. Sensitive information is a subset of personal information and is generally relevant to us connecting you to services (including third party service providers) where you seek welfare, claims or advocacy support.

Sensitive personal information or an opinion includes an individual's racial or ethnic origin, political opinions, political association membership, religious beliefs or affiliations, philosophical beliefs, professional or trade association membership, trade union membership, sexual orientation or practices or criminal record, and includes health information and genetic information.

How do we collect your Personal Information?

Personal information is collected from you in the following ways:

- by providing it to us directly through our website, text message, social media, electronically, cloud drop, smart forms, online forms, in person, surveys and mail;

We generally endeavour to collect your information directly from you. However, in some circumstances we may collect your information from third parties, such as:

- your employer, medical practitioner, guardian or contracting agency, your business contacts or other organisations that you deal with, regulatory or credit reporting agencies, National Archives, a supplier or from a publicly available record; or
- where you apply for a role with us, from consultants, practitioners, previous employers, universities, hospitals, clinics, program providers and others who may be able to assist us.

For other methods of collection, please see "Using Our Website, Electronic Messages and Cookies" below.

How do we use the Personal Information?

RSL Darwin makes use of the collected personal information in a number of ways, which includes but is not limited to):

- offering products and services to members, donors, beneficiaries and the general public (please see out list of services on our website which may change from time to time)
- facilitating internal and external administrative processes including financial and business operations and reporting requirements
- recruitment, volunteering and contracting
- compliance with the terms of our insurance policies
- compliance with applicable laws, not-for-profit laws or court orders
- engagement of third-party for shared or support services to offer our product and services
- provide wellbeing, financial, social and recreational assistance
- liaise with our regions, head branches and subbranches
- facilitating day club activities, events, conferences, training, workshops, marches, rallies
- engagement of third-party contractors for information technology service providers; conference, function and training organisers; marketing, communications and research agencies; freight and courier services; printers and distributors of direct marketing material
- to engage and deal with external business advisers, professional services, government shared services, funding partners

To identify the devices and IP addresses and ISPs you use to access our website or online services (as further set out under "Using Our Website, Electronic Messages and Cookies" below)

How do we store and hold your Information?

We may hold your personal information in either electronic or hard-copy form. We use a variety of physical and electronic security measures to keep your personal information secure from misuse, interference, loss or unauthorised access, use or disclosure.

For example, we restrict physical access to our offices, employ firewalls, secure databases, password protect our IT systems, frequently update our anti-virus software, use cyber security services and conduct regular audit and data integrity checks. All of our employees and service providers such as electronic software for live form creation are contractually bound to keep your personal information secure and treat it as confidential.

However, we cannot guarantee the security of your personal information. The internet is not a secure environment. If you do use the internet to send us any information, including your email address, please be aware that it will be sent at your own risk.

Our websites and electronic communications may contain links to other websites operated by third parties. Unless expressly stated otherwise, RSL Darwin is not responsible for the privacy practices or the content of those linked websites. The privacy policies that apply to those other websites may differ from our privacy policy, so we encourage individuals to read them before using those websites.

Are you required to provide personal information to us?

You may deal with RSL Darwin anonymously. However, it may have an effect on the services we may provide to you. For example, we may not be able to arrange a service for you or permit involvement in an event.

In some circumstances, we allow individuals the option to be anonymous, or of using a pseudonym, when dealing with us in making a donation or the like.

Is personal information disclosed outside of Australia?

Only where absolutely necessary, we will disclose personal information to overseas recipients, including a related body corporate. The likely countries that information might be sent to include United State of America and Canada.

Contacting Us

If you would like more information about how we handle your information, opt-out of receiving direct marketing communications or our approach to privacy, or to exercise any of your rights outlined above, please contact our **Privacy Officer**:

Privacy Officer
sec@rsldarwin.org.au
Tel: (08) 8941 5848
GPO Box 1757, Darwin NT 0801

How can personal information be accessed or corrected?

A person may access their personal information and seek correction of it at any time by applying to our office in person or in writing. Clients will be formally identified before releasing or amending any personal information.

Making a complaint

If there you suspect there has been a breach of this privacy policy, the Act or the APP by us, a complaint may be made to:

- our Privacy Officer; or
- the Office of the Australian Privacy Commissioner.

Please include your name, email address and telephone number and clearly describe your complaint. Any complaint will be investigated by the Privacy Officer and the outcome of that investigation will be communicated to you as soon as we can do so.

If you are not satisfied with the outcome of any internal investigation, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC). More information is available on the OAIC's website at <https://www.oaic.gov.au/>.

Direct Marketing

RSL Darwin will send members information and newsletters relevant to their membership and the veteran's community.

Direct marketing or the promotion of goods and services directly to you may be conducted from time to time, including through emails, SMS, phone calls and the post. RSL Darwin will only send you direct marketing materials if you reasonably expect to receive them or you have consented.

We will not use your sensitive information for the purposes of direct marketing unless you have given us prior consent.

If it is impractical to gain your consent, we will always provide a simple means for you to request not to receive the material ('opting out'). You can opt out of receiving marketing communications from us by contacting the Privacy Officer (details are set out at the end of this policy).

Terms of Use

Using our Website, Electronic Messages and Cookies

We may collect and store information about your use of our website, such as which pages you visit, the time and date of your visit and the IP (internet protocol) or MAC (media access control) address assigned to your device.

We and our ISP also collect information such as the pages you access on our website, the documents you download, the amount of time you spend on a page or viewing a webinar, which links you use to access our site and the type of device and browser you use. This information is used to improve the services we offer you, for statistical, website development and functionality purposes, and for complying with reporting obligations.

We may also use cookies to collect information about your activity on our website so that we can send you information we think may be of interest to you.

When cookies are used on this site, they store information about your visit, which may include a unique identifier or value to indicate whether you have visited a webpage. We may use this to identify you when you engage with our website more than once.

Most internet browsers are set up to accept cookies. If you do not wish to enable cookies, you may be able to change the settings of your browser to refuse all cookies or to notify you each time a cookie is sent to your computer.

If you click through to our website from any insight, invitation, legal update or other email or message we send to you, we may identify and collect information relating to your subsequent and previous use of our website, such as which pages you visit and for how long.

We will hold that information and, subject to your communication preferences, we may contact you in relation to those insights or service areas. If you do not want to receive marketing emails from us, you can opt out at any time using the contact details set out below or unsubscribe at this address.

Data Breaches

All staff are responsible for protecting the confidentiality of client information and business information. Refer any data breaches, or suspected data breaches, to the Privacy Officer as soon as possible.

What is an eligible data breach?

An eligible data breach, defined in s 26WE(2) of the Act, is when:

- (a) *both of the following conditions are satisfied:*
 - (i) *there is unauthorised access to, or unauthorised disclosure of, the information;*
 - (ii) *a reasonable person would conclude that the access or disclosure would be likely to result in serious harm to any of the individuals to whom the information relates; or*
- (b) *the information is lost in circumstances where:*

- (i) *unauthorised access to, or unauthorised disclosure of, the information is likely to occur; and*
 - (ii) *assuming that unauthorised access to, or unauthorised disclosure of, the information were to occur, a reasonable person would conclude that the access or disclosure would be likely to result in serious harm to any of the individuals to whom the information relates;*
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If there is a suspicion of a breach

If we suspect that there has been an eligible data breach, a reasonable and expeditious assessment will be conducted within 30 days.

If we believe or have reasonable grounds to believe there has been a breach then a statement will be prepared setting out:

- the business's details;
- a description of the breach;
- the kind or kinds of information concerned; and
- recommendations about the steps that we will take in response to it.

If practicable, we will advise the contents of the statement to each of the affected clients who may be at risk from the breach. If this is not practicable we will publish the statement on our website and take other reasonable steps to publicise its contents. Communications with individuals will be via their preferred communication method.

The statement will be submitted to the Privacy Commissioner.

Exception to reporting

Mandatory notification requirements are waived if remedial action can be taken that results in a reasonable person concluding that the access or disclosure is not likely to result in serious harm to any of those individuals.