



Name of Policy:	Privacy Policy
Date of Adoption:	
Authorised By:	Board of Management
Date Last Reviewed:	Reviewed by: Chief Executive Officer, WSSSA
Policy area:	Governance
Legislation/Other Requirements:	Standard 1: Governance and Management

Purpose

Women's Safety Services SA ("WSSSA") is committed to protecting the confidentiality and privacy of personal information which the organisation collects, stores and administers and that persons dealing with us understand our practices in relation to the management of personal information.

Scope

This Policy applies to all clients, employees, volunteers, students, contractors, and associates of Women's Safety Services SA Incorporated.

Policy Statement

Women's Safety Services SA Incorporated (ABN 58 693 202 217) ("us", "we" or "our") is committed to protecting the privacy of personal information it collects, holds and administers.

We are an APP Entity as defined in the Privacy Act 1988 (Cth) (the "Act"). This Privacy Policy is aligned with the Privacy Principles as set out in the Act and describes the way we may collect, hold and disclose personal information.

This Privacy Policy also applies to our social media platforms and website, www.womenssafetyservices.com.au (the "Site") which is operated by us, and to the services provided by us.

We provide crisis and ongoing support services for people affected by domestic, family and or sexual violence (collectively, the "Services").



Procedure

Collection

We will collect only that information which the agency requires to conduct its business.

We may collect the following types of Personal Information:

- Your contact details including your name, email address, and contact telephone numbers;
- Your Tax File Number, banking information, and Superannuation information;
- Employment history;
- Details regarding conversations and interactions we have had with you;
- Relevant information provided to us from other agencies; and
- Any other relevant information provided to us as necessary to deliver our services.

Use and Disclosure

Personal and Sensitive Information will only be used or disclosed for the purposes it was collected or a directly related secondary purpose and in accordance with the Privacy Principles under the Act.

We may, from time to time, be required to use personal information for another purpose where it would be reasonably expected by you, or if compelled by law including:

- Use and disclosure of information where failure to disclose would result in a seriously adverse outcome for the client or contravene any Act
- Use and disclosure of information with the person's knowledge and consent
- Release of information to third parties, where requested by the person concerned and without causing harm or the potential for harm to other parties
- Release of information without the person's consent or knowledge only in those instances where failure to disclose would result in serious risk of harm or injury and according to the procedures stipulated in:
 - our Information Sharing Guidelines for Promoting Safety and Wellbeing and as endorsed by the Office of the Guardian for Children and Young People
 - the Family Safety Framework in relation to information sharing where clients/families are at risk of serious harm or death. The South Australian Information Privacy Principles (IPPS) Instruction 18 May 2009 forms the basis of information sharing for Women's Safety Services SA Incorporated.
- In the process of procuring advice from legal, accounting firms, auditors, contractors, consultants or other advisors

WSSSA will:

- Ensure clients, workforce, students, contractors and associates are informed about the collection and administration of personal information
- Notify those above that their personal information is accessible to them



Quality and Access to Information

We will take reasonable steps to ensure Personal Information is accurate, complete, up to date and relevant to the function for which it was taken.

Subject to the exceptions allowed by law, you have the right to access Personal Information we hold about you and to seek its correction. Please contact us (at our details provided below) to request access to your information, or if you have a complaint concerning your information privacy.

We may refuse to disclose information to a third party where the information is not directly related to the services required or may lead to serious risk of harm or injury as stipulated in our Information Sharing Guidelines For Promoting Safety and Wellbeing.

We may decline a request to access or correct Personal Information where allowed under the Australian Privacy Principles, if required to do so by law, or where the information may relate to existing or anticipated legal proceedings. We will take reasonable endeavours to provide you with our reasons in writing. Depending on the circumstances, we may charge you reasonable costs for providing access to your Personal Information. There is no fee for lodging requests.

Security

We take appropriate measures to keep your Personal Information secure. We hold your Personal Information in a combination of hard copy and electric files. We use commercially reasonable physical, technical and administrative measures to protect the security of the Personal Information that we collect or receive, including, where appropriate, password protection, encryption, and SSL to protect our Site and the information we collect from loss, misuse, and unauthorized access, disclosure, alteration, and destruction.

If we no longer require your information we will take reasonable steps to ensure personal information is stored securely or destroyed appropriately and completely. We will take reasonable steps to store securely, destroy or permanently de-identify it.

Despite taking appropriate measure to protect personal information used and collected by us, please be aware that no data security measures can guarantee 100% security all the time. We cannot guarantee the security of any information transmitted to us via the internet and such transmission is at your risk. Our website may contain links to other websites. We are not responsible for the privacy practices or content of such websites.

Personal information may be stored electronically through third party data centres, which may be located overseas, or in physical storage at our premises or third party secure storage facilities.

You are solely responsible for the maintaining the secrecy of any passwords and other account information pertaining to our Platform, apps or services.

Identifiers

We will not adopt as our own any Identifier of you, or use or disclose an Identifier of you which has been assigned by a government agency, unless allowed by the National Privacy Principles set out in the Act.



Transparency

We aim to ensure all stakeholders are aware of our Privacy Policy and its purpose. Our Privacy Policy is published on our website and all information regarding our privacy procedures are freely available.

We may change this Privacy Policy from time to time. Any updated versions of this Privacy Policy will be posted on our Site - you should check periodically to review our current Privacy Policy, which is effective as of the effective date listed below. Your continued use of any of our Site and Services constitutes your acceptance and understanding of the Privacy Policy as in effect at the time of your use. If we make any changes to this Privacy Policy that materially affect our practices with regard to the Personal Information we have previously collected from you, we will endeavour to provide you with notice in advance of such change by highlighting the change on the Site, or where practical, by emailing Customers.

Direct Marketing Materials

We may send you direct emails and information about services and events that we consider may be of interest to you. These communications will only be sent via email and in accordance with applicable marketing laws, such as the *Spam Act 2004* (Cth) as you consented to upon registering for our Services. If, at any time, you would like to stop receiving these emails, you may follow the opt-out instructions contained in any such email. Please note that it may take up to 10 business days for us to process opt-out requests. If you opt-out of receiving emails or promotions from us, we still may send you emails about any Services you receive from us, or for other customer service purposes. We do not provide your personal information to other organisations for the purposes of direct marketing.

If you receive communications from us that you believe have been sent to you other than in accordance with this Privacy Policy, or in breach of any law, please contact us using the details provided below.

Cookies, Web Beacons, and Analytics

When you interact with our Site, we strive to make your experience easy and meaningful. We, or our third-party service providers, may use cookies, web beacons (clear GIFs, web bugs) and similar technologies to track site visitor activity and collect site data. Examples of information that we may collect includes technical information such as your computer's IP address and your browser type, and information about your visit such as the products you viewed or searched for, the country you are in, what you clicked on and what links you visited to get to or from our site.

If we identify you with this information, any use or disclosure of that information will be in accordance with this Privacy Policy.

A cookie is a text file that a website transfers to your computer's hard drive for record-keeping purposes. Cookies help us gather and store information about visitors to our websites and are intended to improve your website browsing experience whilst ordering. Our cookies assign a random, unique number to each visitor's computer. They do not contain information that would personally



identify the visitor, although we can associate a cookie with any identifying information that is or has been provided by a Customer while visiting our Site.

We, or our third-party service providers, use cookies that remain on your computer for a specified period of time or until they are deleted (persistent cookies). These cookies record clickstream information (data reporting the URLs, or names of the pages, on our Site that have been visited). We may also use cookies that exist only temporarily during an online session (session cookies) – these cookies allow you to log in to your account and they allow us to identify you temporarily as you move through the Site. Most browsers allow users to refuse cookies, but doing so may impede the functionality of some portions of our Site.

Web beacons are tiny graphics with a unique identifier, similar in function to cookies that are used to track the online movements of web users. In contrast to cookies, which are stored on your computer's hard drive, web beacons are embedded invisibly on web pages and may not be disabled or controlled through your browser.

We may also engage third parties, including Google Analytics, to track and analyse Site activity on our behalf. To do so, these third parties may place cookies or web beacons to track user activity on our Site. The information generated by these cookies (including your truncated IP address) is transmitted to and stored by Google, and other third party providers, on servers in the United States. Google will use this information for the purpose of evaluating your, and other users' use of our website, mobile website, compiling reports for us on website activity and providing other services relating to website activity and internet usage.

We use the data collected by such third parties to help us administer and improve the quality of the Site and to analyse usage of the Site.

Consent to transfer information outside Australia

We may disclose your personal information to organisations in other countries. Recipients may include:

- (a) Anyone that you have consented for us to disclose personal information to;
- (b) Our related entities, employees or officers;
- (c) External service providers that may assist us in our business providing administration, information technology or other services;
- (d) External service providers, if necessary for us to provide you with requested products or services;
- (e) Cloud providers and storage, data processors; and
- (f) Any other person or entity required by law.

We take all reasonable steps necessary to ensure that your data is treated securely and in accordance with this privacy policy. It should be noted however, that international recipients may not have data protection laws that provide the same level of protection that exists under the Australian Privacy Principles.



Anonymity

We value your feedback and offer all stakeholders the option of anonymity when completing feedback or evaluation forms.

Complaints or Enquiries

If you have any questions or complaints regarding privacy, or if at any time, you believe we may have wrongfully disclosed your personal information or breached our Privacy Policy, please contact us on 08 8152 9200 or lodge your complaint in writing to:

Women's Safety Services SA
PO Box 79
Hilton Plaza SA 5033

or at contact@womenssafetyervices.com.au.

If you are not satisfied with our response you are entitled to contact the Federal Privacy Commissioner, by phoning 1300 363 992 or writing to the Director of Complaints, Office of the Federal Privacy Commissions, GPO Box 5218, Sydney NSW 1042.



Documents supporting policy

<i>Other supporting documents</i>	
Related Policies:	<ul style="list-style-type: none"> • WSSSA Code of Conduct • WSSSA Confidentiality Policy • WSSSA Client Records Policy • WSSSA Access to Personnel Files Policy • WSSSA Client Access to Personal Information Policy
Forms or Other Organisational Documents:	<ul style="list-style-type: none"> • WSSSA Information Sharing Guidelines • WSSSA Confidentiality Agreement • WSSSA Responding to Subpoenas Guidelines

Policy Review Frequency: Bi-Annually	Responsibility for Review: Chief Executive Officer
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Definitions

The following definitions apply to this Privacy Policy:

“Personal Information” means any information that may identify you, or by which your identity might be reasonably determined. The information you provide us may include, amongst other things, your name, address, and telephone number.

“Sensitive Information” means any information about an individual’s racial or ethnic origin, political opinions, memberships of a political organisation, religious belief or affiliation, philosophical belief, memberships of a professional trade or trade association, membership of a trade union, sexual preference or practices, criminal record or health information.

“Identifier” is a unique number assigned to an individual to uniquely identify the individual. Identifiers include Medicare Numbers and Tax File Numbers.