

#### **PRIVACY POLICY**

# Objective

This Privacy Policy aims to explain how and why personal information is collected, how it is used, and what controls individuals have over how this information is used. Foundation Nova Diem is committed to protecting and safeguarding the privacy, confidentiality and security of personal information and the need to comply with the Commonwealth Privacy Act and the 10 National Privacy Principles which set out the way in which organisations must deal with personal information.

### Scope

This Policy applies to all employees, Board and Committee/Team members, contractors, volunteers, donors, and other stakeholders.

# **Policy Statement**

The objective of this Policy is to ensure the following key principles are reflected in the Foundation's management practices.

### **Collection of Information**

Some information provided by customers, contractors and other third parties might be considered private or personal. Without these details we would not be able to carry on our business and provide services. We will only collect such personal information if it is necessary for delivery of our services.

The Foundation collects information in a number of ways from individual persons in different situations. Personal information is collected from people in the following situations by the Foundation:

- Participants in Foundation initiatives who complete paper based or online forms through the Foundation's website or otherwise and are required to provide some personal information and banking and contact details
- Partners or donors are required to provide contact and bank account details
- Suppliers of goods and services to the Foundation are required to provide contact and bank account details
- Prospective employees of the Foundation provide personal information for the purposes of obtaining employment within the Foundation
- If you contact the Foundation either by telephone, social media, mail, email, or any electronic communications method, we may keep a record of that correspondence and may use this as required.







At or before the time the personal information is collected by us we will take reasonable steps to ensure that you are made aware that we are collecting personal information, the purpose for collecting this information, the type(s) of organisations (if any) to which we usually disclose this information, the legislation governing the collection and use of this information and your right to access this information.

We will take reasonable steps to make sure that the personal information collected, used or disclosed is accurate, complete and up-to-date.

#### Use of Information Collected and Disclosure of Personal Information to Others

We may use or disclose personal information held about an individual for the primary purpose for which it is collected, such as to keep students and stakeholders informed about the ongoing activities of the organisation and to assist us in improving our services or in assessing applications for our program and organisational improvement.

Information provided by you may be used by the Foundation in the following ways:

- To maintain your individual record and a comprehensive database
- To provide information to you to enable you to access the services and benefits available to you as a Foundation stakeholder
- To provide you information about stakeholders that are associated with but not part of the Foundation
- To conduct research in order to identify and analyse the ongoing needs of the Foundation and participants, and to identify future potential participants, services and benefits

Information provided to the Foundation may be disclosed to the following bodies:

- Program providers, collaborators, researchers, and evaluators
- Appointed and authorised representatives of the Foundation

We may also use such information for a purpose related to the primary purpose of collection and where it would reasonably be expected by you that we would use the information in such a way.

This information is only disclosed to persons outside our business in the circumstances set out in this policy or as otherwise notified to you at the time of collection of the information.





We are permitted to use or disclose personal information held about you:

- Where you have consented to the use or disclosure
- Where we reasonably believe that the use or disclosure is necessary to lessen or prevent a serious, immediate threat to someone's health or safety or the public's health or safety
- Where we reasonably suspect that unlawful activity has been, is being or may be engaged
  in and the use or disclosure is a necessary part of our investigation or in reporting the
  matter to the relevant authorities
- Where such use or disclosure is required under or authorised by law (for example, to comply with a subpoena, a warrant or other order of a court or legal process) or required to inform
- Where we reasonably believe that the use or disclosure is reasonably necessary for prevention, investigation, prosecution and punishment of crime or wrongdoings before any court, tribunal or enforcement body

We will not use or disclose personal information about an individual for a purpose (the secondary purpose) other than the primary purpose of collection unless the secondary purpose is related to the primary purpose of collection and the individual would reasonable expect the organisation to use or disclose the information for the secondary purpose or the individual has consented to the use or disclosure.

We will not use personal identification numbers that have been assigned to an individual by a governmental department or agency.

Unless specified herein we will not pass any of your personal information to any third party, other than agents of the Foundation, without the consent of the individual.

Your personal contact information will never be given, sold, or otherwise shared by the Foundation with third parties for advertising or marketing purposes.

## Links

Our web site may contain links to other web sites and those third-party web sites may collect personal information about you. We are not responsible for the privacy practices of other businesses or the content of web sites that are linked to our web site. The Foundation encourages users to be aware when they leave the site and to read the privacy statements of each and every website that collects personally identifiable information.







## **Security and Storage**

The Foundation places a great importance on the security of all information associated with our students and stakeholders. We have implemented technology safeguards, security policies and other measures to protect data under our control from unauthorised access, improper use, alteration, unlawful or accidental destruction or accidental loss. We also protect your information by requiring that all our employees and others who have access to or are associated with the processing of your data to respect your confidentiality.

The Foundation retains the information you provide to us including your contact and bank account details to enable us to verify transactions and customer details and to retain adequate records for legal and accounting purposes. This information is held on secure servers in controlled facilities.

Information stored within our computer systems can only be accessed by those entrusted with authority and computer network password sanctions.

You should keep in mind that whenever you voluntarily disclose personal information online, for example, through email, that information may in some circumstances be collected and used by others. If you post personal information online that is accessible to the public, you may receive unsolicited messages from other parties in return.

## **Access to and Correction of Personal Information**

The Foundation is committed to maintaining accurate, timely, relevant, and appropriate information about our stakeholders.

So long as your request for your personal information is in accordance with the National Privacy Principles, then we will give you access to that information.

Inaccurate information will be corrected upon receiving advice to this effect from you once your identity has been confirmed. To ensure confidentiality, details of your personal information will be passed on to you only if we are satisfied that the information relates to you.

If we refuse to provide you with access or correct the personal information held about you then we will provide reasons for such refusal.





# **Complaints**

### **Further Information**

If you have a complaint about our Privacy Policy or the collection, use or safe disposal destruction of your personal information, your complaint should be directed in the first instance to the Chief Executive Officer, Foundation Nova Diem.

We will investigate your complaint and attempt to resolve any breach that might have occurred in relation to the collection, use or destruction of personal information held by us about you in accordance with the Commonwealth Privacy legislation. If you are not satisfied with the outcome of this procedure, then you may request that an independent person (usually the Commonwealth Privacy Officer) investigate your complaint.

Please contact the Foundation should you require further information regarding our Privacy Policy.

Should you wish to read more information on privacy legislation or the National Privacy Principles we recommend that you visit the Office of the Australian Information Commissioner website at <a href="https://www.privacy.gov.au">www.privacy.gov.au</a>

## Responsibilities

**Board**: Establishing strategic directions consistent with the Foundation's stated mission, vision and values, maintaining an effective system of internal control, and monitoring compliance with legal and ethical requirements.

**Management**: Accountability and responsibility for ensuring implementation and compliance with this Policy and all associated internal control procedures supporting this Policy. Responsibility for developing, maintaining, and updating procedures which enable compliance with this Policy.

Date last reviewed	March 2023
Scheduled review date	March 2025
Approved by	Board

