

Canberra Hospital Foundation Limited

Privacy Policy¹

The *Privacy Act* 1988 (Cth) (the **Act**) requires entities bound by the Australian Privacy Principles to have a privacy policy. This Privacy Policy outlines the personal information handling practices of the Canberra Hospital Foundation (the **CHF, our, we** or **us**).

1. POLICY STATEMENT

The CHF is committed to protecting the privacy of the personal information and sensitive information which it collects and holds, in accordance with the Act.

The purpose of this Privacy Policy is to explain:

- (a) the kinds of information that the CHF may collect about you and how that information is held;
- (b) how the CHF collects and holds personal information;
- (c) the purposes for which the CHF collects, holds, uses and discloses personal information;
- (d) how you can access the personal information the CHF holds about you and seek to correct such information; and
- (e) the way in which you can complain about a breach of your privacy and how the CHF will handle that complaint.

2. DEFINITIONS

In this Privacy Policy the following terms have the following meanings:

health information means:

- (a) personal information or an opinion about:
 - (i) an individual's physical or mental health or disability (at any time);
 - (ii) an individual's express wishes about the future provision of health services for themselves; or
 - (iii) a health service provided, or to be provided, to an individual;
- (b) other personal information collected to provide, or in providing, a health service;
- (c) other personal information about an individual collected in connection with the donation, or intended donation, by the individual of his or her body parts, organs or body substances;
- (d) genetic information about an individual in a form that is, or could be, predictive of the health of the individual or a genetic relative of the individual; or
- (e) sensitive information.

personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- (a) whether the information or opinion is true or not; and
- (b) whether the information or opinion is recorded in a material form or not;

¹ Current version approved September 2020

sensitive information means:

- (a) personal information or opinion about an individual's:
 - (i) racial or ethnic origins;
 - (ii) political opinions or political associations;
 - (iii) philosophical beliefs or religious beliefs or affiliations;
 - (iv) sexual preferences or practices; or
 - (v) criminal record; or
- (b) health information about an individual; or
- (c) genetic information about an individual that is not otherwise health information.

3. COLLECTION AND USE OF PERSONAL INFORMATION

3.1 Types of personal information collected by the CHF

The CHF collects personal information from donors, supporters, volunteers, patients and other contacts that is necessary for it to perform its functions. The types of personal information the CHF collects, and the purposes of collecting that information may include (as applicable):

- **Donors:** When you make a donation, including via this website, in person, over the phone, by direct deposit, via email, by post, or through our fundraising personnel or volunteers as part of any of our fundraising events, or activities, or at our offices. The CHF collects and stores in our database your name, phone number, address, email address, date of birth, payment and billing details (including credit card details if relevant), and other contact information. For example, we may ask you if you or your family members have used a service within ACT Health previously. Information is used to process your donation, complete your tax receipt if applicable, or send you further information about the CHF for promotional purposes with approval.
- **Supporters and volunteers:** the CHF may also collect its supporters' and volunteers' names, phone numbers, addresses, email addresses, and other contact information, records of communication between them and the CHF and other personal information about our current and potential supporters and volunteers so that we can encourage, record and acknowledge their support and communicate with them about the CHF and our activities.
- **Patients:** the CHF may receive or request details with the patient's or guardians' approval about individual patients, such as their name, age and with the patient's or guardian's consent, their medical condition, medical treatment, and medical history, for media or donor impact reports, and may communicate directly with patients and their families for this purpose. All patient information received and collected by the CHF will be treated in the strictest confidence and will not be made public or distributed without prior patient or guardian written consent.
- **Distributing publications:** We collect contact details (which may include name, phone number, address, email address, and other contact information) when individuals contact or interact with us in order to distribute newsletters and other communications in print and electronic form from time to time. Recipients may choose to have their contact details removed from our distribution lists by contacting

our Community Engagement team using the contact details at the end of this Privacy Policy.

- **Conducting events:** We may collect contact details, donation history and other personal information, including photographs and videos, about patients and their family members, donors, volunteers and other supporters who wish to join or participate in our events, programmes we conduct and our publications. This information is used to administer these events, promote and seek support for such events, share individuals' stories with the community and for the activities of the CHF.
- **Assisting with your queries:** You may choose to provide us with your name or other contact details when you call us by phone, or write to us, so that we can respond to your request.
- **Conducting our general business activities:** the CHF collects personal information about individuals who are, or are employed by, our suppliers (including service and content providers), contractors and agents for our general business operations.
- **Applying for a position (as a volunteer or employee) with the CHF:** We may collect your personal information, including name and contact details, information about your working history and relevant records checks (including criminal and working with children checks) when you apply for a position with us in order for us to assess your suitability for that or other positions.
- **Credit Card Data:** Any credit card transaction information processed via our database is not stored by the CHF, but rather with a contracted cloud based third party storage provider. Credit card transaction data for recurring donations is stored tokenised in a secure payment gateway that is PCI compliant. Any manual forms returned to the CHF with credit card details on them are masked and stored securely

3.2 How we collect personal information

We will usually collect your personal information directly from you, however sometimes we may need to collect information about you from third parties, such as:

- (a) parents;
- (b) carers;
- (c) guardians; or
- (d) other third-party information sources.

We will only do this if:

- (a) you have consented to such collection;
- (b) such collection is reasonably necessary to enable us to appropriately manage, conduct and oversee the CHF's activities; and
- (c) it is legally permissible for us to do so.

3.3 Use and disclosure of personal information

The CHF uses and discloses personal information collected for the **primary purpose** of:

- processing donations and communicating with our donors and supporters, including sending them information (which may be by phone, post, email or other electronic means directly from us or a third-party mailing house);
- communicating with donors, prospective donors and supporters, patients and their family members, employees and volunteers (including responding to queries and complaints) and distributing our publications, conducting fundraising events, appealing for further donations and supporting and raising awareness about our fundraising activities and our mission; and
- conducting our general business activities, including interacting with contractors and service providers, billing and administration including measuring and assessing the level of support we receive and the effectiveness of our fundraising activities and assessing applicants for positions with us.

The disclosures referred to above may include disclosure to our third parties such as our contractors, service providers, partners, employees and volunteers only to the extent necessary for them to perform their duties to us. We use a range of suppliers, service providers, contractors and partners to enable us to perform the activities and functions of the CHF. They include information technology service providers, banks and credit card companies. Such disclosure will always be made under strict obligations of confidentiality and only when necessary to enable the proper management of the CHF's activities.

We may also disclose the personal information of patients to their family members or guardian, for the purpose of discussing stories about their experience with Canberra Health Services which the patients have agreed to share via our publications or for other fundraising activities. We may, with your permission, also send the patient stories to third parties to help promote their fundraising efforts for the CHF and refer to patient stories in our publications, including on our website. Any personal information disclosed via our website may include disclosure to recipients who access our website in countries outside Australia.

To opt out, people can:

- Select the "unsubscribe" option in one of the marketing or fundraising communications they receive from us
- Call us on (02) 5125 3542
- Email: hello@chfoundation.org.au
- Mail: Canberra Hospital Foundation, PO Box 11, Woden ACT 2606

The CHF only uses your personal information for the primary purpose for which it was collected by the CHF, unless:

- (a) there is another purpose (secondary purpose) and that secondary purpose is directly related to the primary purpose, and you would reasonably expect, or the CHF has informed you, that your information will be used for that secondary purpose;
- (b) you have given your consent for your personal information to be used for a secondary purpose; or
- (c) the CHF is required or authorised by law to use your personal information for a secondary purpose (including for research and quality improvements within the CHF).

3.4 Complete and accurate details

Where possible and practicable, you will have the option to deal with the CHF on an anonymous basis or by using a pseudonym. However, if the personal information you provide us is incomplete or inaccurate, or you withhold personal information, we may not be able to provide the assistance or support you are seeking, or deal with you effectively.

3.5 Third party service providers

Where we engage third party service providers, we may disclose personal information to those service providers who may use, process and/or store that information overseas.

4. ACCURACY AND STORAGE OF PERSONAL INFORMATION

4.1

The CHF will take reasonable steps to ensure that your personal information which is collected, used or disclosed is accurate, complete and up to date.

4.2

All your personal information held by the CHF is stored securely in either hard copy or electronic form with a third party storage provider. The CHF strives to ensure the security, integrity and privacy of personal information, and will take reasonable steps to protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure. The CHF reviews and updates (where necessary) its security measures in light of current technologies.

4.4

While the CHF does all it can to protect the privacy of your personal information, no data transfer over the internet is 100% secure. When you share your personal information with the CHF via an online process, it is at your own risk.

There are ways you can help maintain the privacy of your personal information, including:

- (a) always closing your browser when you have finished your user session;
- (b) always ensuring others cannot access your personal information and emails if you use a public computer; and
- (c) never disclosing your user name and password to third parties.

4.5

If you notify the CHF about a data breach, we will not disclose personal information about you unless you agree, or would reasonably expect us to.

If the CHF becomes aware of a data breach, we will comply with our obligations pursuant to the *Commonwealth Privacy Amendment (Notifiable Data Breaches) Act 2017*.

5. USE OF COOKIES

The CHF's website may use cookies to collect statistics on visitor traffic. No personal information is collected, rather the patterns of usage of visitors to the website may be tracked for the purposes of providing improved service and content based on aggregate or statistical review of user site traffic patterns.

The CHF's website may also use Google Analytics features which allow us to tailor our marketing to better suit your needs.

If you prefer not to allow this, you may be able to adjust your browser to turn off the use of “cookies” or to notify you when they are being used. However, if you disable cookies, you may not be able to access certain areas or take advantage of certain features of the CHF’s website. If you choose to not have your browser accept cookies from the CHF’s website, you will need to re-enter your personal information each time that you attempt to access information. You can also opt out of programs like Google Analytics if you wish: <https://tools.google.com/dlpage/gaoptout/>.

6. LINKS TO OTHER SITES

The CHF may provide links to third party websites. These linked sites may not be under our control and the CHF is not responsible for the content or privacy practices employed by those websites. Before disclosing your personal information on any other website, we recommend that you carefully read the terms and conditions of use and privacy statement of the relevant website.

7. ACCESSING AND AMENDING YOUR PERSONAL INFORMATION

You have a right to access your personal information which the CHF holds about you. If you make a request to access your personal information, we will ask you to verify your identity and specify the information you require.

You can also request an amendment to any of your personal information if you consider that it contains inaccurate information.

You can contact the CHF about any privacy issues as follows:

- Call us on (02) 5125 3542
- Email: hello@chfoundation.org.au
- Mail: Canberra Hospital Foundation, PO Box 11, Woden ACT 2606

While the CHF aims to meet all requests for access to personal information, in a small number of cases and where permitted to do so by law, the CHF may not give access or may do so only under conditions.

Subject to applicable laws, the CHF may destroy records containing personal information when the record is no longer required by the CHF.

8. COMPLAINTS

The CHF aims to deal with all complaints in a fair and efficient manner. If you have a complaint about the CHF’s information handling practices or consider we have breached your privacy, you can lodge a complaint with:

- (a) the CHF’s Chief Executive Officer, using the contact details listed in clause 7 above; or
- (b) the Office of the Australian Information Commissioner: by calling 1300 363 992 or in writing to:

Office of the Privacy Commissioner
GPO Box 5218
Sydney, NSW 2001

Or online at: <https://www.oaic.gov.au/about-us/contact-us/>