

SUNNYFIELD PRIVACY POLICY

This Privacy Policy sets out how Sunnyfield complies with our obligations under Australian privacy law. Sunnyfield is bound by the Australian Privacy Principles (APPs) which regulate how organisations may collect, use, disclose and store personal information and how individuals may access and correct personal information held about them.

The terms in this Privacy Policy have the same meaning as in the APPs. Personal information (as defined in the Privacy Act) means: information or an opinion about an identifiable or reasonably identifiable individual, whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not.

Please read this Privacy Policy carefully and contact us at privacy@sunnyfield.org.au if you have any questions. Supply of your personal information whether through our website at www.sunnyfield.org.au (Site) or otherwise indicates that you have had sufficient opportunity to access, read, understand and accept the Privacy Policy. If you do not wish to provide personal information to us then you do not have to do so, however it may affect your use of our website or any products and services offered.

1. Our Information Handling Practices

1.1 Why we collect personal information

Sunnyfield collects personal information to enable us to:

- Provide services and/or health support and/or help people access the services they need;
- Bill you, the NDIA or other service providers for services rendered;
- Assess, investigate, conciliate, determine or monitor privacy or other complaints, feedback, incidents or disputes;
- Assess, investigate and respond to any allegations of abuse, assault or neglect of clients and to provide the required reports to relevant regulatory authorities, including mandatory reports to the NDIS Quality & Safeguards Commission, NSW Ombudsman;
- Respond to enquiries;
- Distribute information about our activities or publications to people who may have an interest in Sunnyfield;
- Employ and pay staff;
- Engage with volunteers;
- Engage with organisational members;
- Solicit, accept and receipt donations, and acknowledge donors; and
- Send you promotional information that we think may be of interest to you.

Sunnyfield collects this information on a 'need to know' basis - we collect only what we need to enable us to do these things.

1.2 What type of personal information do we collect

The personal information we collect may include:

- Images and photographs;
- Date of birth;
- Contact details;
- Bank account details, tax file numbers;
- Family and/or guardian contact details;
- Disability Pension Number, Medicare number and other government identifiers;
- Medication information;
- Information needed to develop, monitor and where required report on a client's Support Plan or Person Centred Plan;
- Driver's licence numbers;
- Previous employment information including qualifications;
- Next of kin (where the person is a member of Sunnyfield staff or that information is otherwise necessary for one of Sunnyfield's functions); and
- Other personal, health and sensitive information as needed or required by law or regulatory authorities.

The type of information we collect includes health and other sensitive information, as well as government identifiers as per clause 1.6.

Your opinion and feedback: We may contact you for responses to questionnaires, surveys or market research or to seek your feedback on Sunnyfield services from time to time. Providing this information is at your option.

1.3 From whom do we collect information?

In most circumstances, we collect personal information from the individual to whom the information relates. Information may be collected from clients, their family, guardian or carer; Sunnyfield staff, Sunnyfield supported employees; Sunnyfield Members, Directors, Associates, Patrons, Ambassadors and Friends of Sunnyfield; Sunnyfield business customers, donors, volunteers and Government and non- Government stakeholders. Sometimes we collect personal information from a third party or a publicly available source, but only if it is unreasonable or impracticable to collect it from the individual. In those circumstances, Sunnyfield will take reasonable steps, where practicable, to inform the individual that the information is being or has been collected. In some limited circumstances, we collect or obtain consent for the use or disclosure of personal information about an individual from an authorised representative (e.g. where the individual is incapable of providing the information or consent due to an illness or disability).

1.4 Use and Sharing of Information

Sunnyfield only uses personal information for the purposes for which the information was collected (e.g. to provide services or support to a person), related purposes where the individual would reasonably expect us to use the information for that purpose, other purposes for which we received consent or otherwise as permitted by the Australian Privacy Principles (APPs). Sunnyfield does not give information about a person to other organisations, government agencies or anyone else unless

one of the following applies:

- The person has consented, for example in entering their Service Agreement with Sunnyfield;
- The person reasonably expects us to share the information;
- It is required or authorised by law, for example to the NDIS Quality & Safeguards Commission, and/or NSW Ombudsman;
- We believe the disclosure is necessary to prevent or lessen a serious threat to life, health or safety and it is unreasonable to obtain the persons consent; or
- In other circumstances permitted by the APPs (e.g. if the disclosure is reasonably necessary for law enforcement purposes).
- The disclosure is to a service provider or advisor retained by Sunnyfield and is necessary in order to assist Sunnyfield to do any of the things set out in clause 1.1.

Information required to be provided to regulatory authorities such as the NDIS Quality & Safeguards Commission, for example in relation to the mandatory reporting of a reportable incident may include information about clients, staff, family and/or guardian names and contact details.

Where we disclose your personal information to third parties for these purposes, we will request that the third party follow this Privacy Policy regarding handling of your personal information. Such third parties may include parties that store data outside of Australia. We note that information provided to regulatory authorities, such as the NDIS Quality & Safeguards Commission, NSW Ombudsman will be collected, used and handled in accordance with respective privacy policies of those organisations.

1.5 Unsolicited Personal Information

When Sunnyfield receives unsolicited personal information we will decide within a reasonable time whether we could have received such information legitimately. If not, we will destroy or de-identify the information unless the information contained involves a Commonwealth record or destroying the information would be unlawful or unreasonable.

1.6 How we treat personal information that is also sensitive information

Sensitive information is a sub-set of personal information that is given a higher level of protection under the Australian Privacy Principles. In referring to 'sensitive information' we mean information that relates to a person's racial or ethnic origin, political opinions, religion, trade union or other professional associations or memberships, philosophical beliefs, sexual orientation or practice and criminal records, health information or biometric information.

The types of sensitive information we collect include:

- Disability Pension Number, Medicare Number and other government identifiers;
- Tax file Number
- Medical information and health care support plans;
- Health Care Support Plan;
- Contact details, including family & guardian contact details; and
- Other personal and sensitive information as needed to provide services.

Sensitive information may be used and disclosed for purposes identified in clause 1.1. Sensitive information may also be used or disclosed if required or authorised by law, including requirements of the regulatory authorities or third parties, such as NDIS Quality & Safeguards Commission and NSW Ombudsman, for example in relation to reportable incidents.

2. Quality and Security of Personal Information

2.1 Data quality

Sunnyfield takes reasonable steps to ensure that the personal information we collect, use or disclose (and our record of any consent in relation to that information) is relevant, accurate, up to date and complete. These steps include maintaining and updating personal information when we are advised by individuals that such information has changed.

2.2 Data security

Sunnyfield takes reasonable steps to protect personal information/images we hold against misuse, loss, unauthorised access, modification and disclosure. These steps include password protection for electronic files, securing paper files in locked cabinets, limiting access to electronic client records, eg. to relevant support staff, physical access restrictions and taking reasonable steps to ensure that when no longer required personal information is securely destroyed or deleted. Sunnyfield adheres to the protocols for maintenance and storage of client and staff information in State and Federal legislation and in specific funding agreements between Sunnyfield and State and Federal agencies and regulators, such as the NDIA.

3. Our Files and You

3.1 Our Types of Files

Sunnyfield maintains the following types of files:

- Client Files (including for Supported Employees)
- Staff Files
- Complaint, Feedback and Praise Files
- Service Delivery & Financial Records
- Audit Files
- Enquiries Files
- Contact Lists

3.2 Your rights and controlling your personal information

Providing us with your personal information is optional. You can choose not to provide personal information. When you provide us with your personal information, you consent to the terms in this Privacy Policy, and to us disclosing or receiving such information for these purposes.

You may choose to restrict the collection or use of your personal information. If you have previously agreed to us using your personal information for direct marketing purposes, you may change your mind at any time by contacting us at the email address listed in this Privacy Policy.

3.3 Your provision of third party information

If you provide us with third party personal information then you warrant to use that you have the third party's consent to provide this information to us.

4. Access and Correction

4.1 Access

You may request details of personal information that we hold about you, in certain circumstances set out in the Privacy Act. We may refuse to provide such information if unreasonable or if a legal exception applies. We may charge an administration fee for the provision of such information.

4.2 Correction

If you believe that any information we hold on you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us by email. We rely in part on customers advising us when their personal information changes. We will respond to any request within a reasonable time and will endeavour to promptly correct any information found to be inaccurate, incomplete or out of date.

5. Complaints

If you believe that we have breached the APPs and wish to make a complaint, please contact us by email setting out details of the alleged breach. We will promptly investigate your complaint and respond to you in writing setting out the outcome of our investigation, what steps we propose to take to remedy the breach and any other action taken.

6. Direct Marketing

From time to time we may send you direct marketing materials about our organisation that we believe may be of interest to you. In doing so we are subject to various laws including the Privacy Act 1988 (Cth) and the Spam Act 2003 (Cth). We carry out our direct marketing activities with either the consent or reasonable expectation of individuals.

Unsubscribe: To unsubscribe from our e-mail database or opt out of communications at any time, please contact us at: marketing@sunnyfield.org.au or any other email address or link specified on any communication issued by us or on our behalf.

7. Online/Electronic Communications

7.1 Electronic communications

No information transmitted over the Internet can be guaranteed to be secure. Although we take measures to safeguard against unauthorised disclosures of information we cannot completely guarantee the security of any information that you transmit or receive from us.

7.2 Use of our website

You may explore and browse our website without providing any information about yourself. When you visit our website, for example, to request further information from us, we generally request that you provide personal information about yourself primarily so that we can respond to your query, provide you with further information etc.

We may use cookies on our website. Cookies are text files placed in your computer's browser to store your preferences. Cookies, by themselves, do not tell us your e-mail address or other personally identifiable information. However, once you choose to furnish the website with personally identifiable information, this information may be linked to the data stored in the cookie.

We may use web beacons on our website. Web beacons or clear GIFs are small pieces of code placed on a web page to monitor the behaviour and collect data about the visitors viewing a web page. For example, web beacons can be used to count the users who visit a web page or to deliver a cookie to the browser of a visitor viewing that page.

Any personal information collected from you in relation to your use of our Website will be collected, handled, disclosed and stored in accordance with this Privacy Policy as amended from time to time. Your continued use of the website indicates your acceptance of this Policy.

7.3 Links to other websites

Our Site may contain links to other websites. We do not have any control over those websites. We are not responsible for or liable for the protection and privacy of any information which you provide whilst visiting such websites, and such websites are not governed by this Privacy Policy.

8. Amendments to Policy

This Privacy Policy may be amended from time to time at our sole discretion. An up-to-date version of the Privacy Statement will always appear on the website. You should check the Privacy Policy regularly, prior to providing personal information, to ensure you are aware of any changes, and only proceed to provide personal information if you accept the new Privacy Policy. Your continued use of our website following any amendments indicates that you accept the amendments.

9. Contact Us

If you would like further information about how we handle personal information or would like to make a complaint about a possible breach of privacy, please contact Sunnyfield's Privacy Officer at privacy@sunnyfield.org.au.

Alternatively you can contact us using the details located below:

Phone: (02) 8977 8800 **Fax:** (02) 8977 8873
Email address: feedback@sunnyfield.org.au
Street Address: 185 Allambie Road, Allambie Heights NSW 2100
Postal Address: PO Box 6432, Frenchs Forest NSW 2086

Signed: *Caroline Cuddihy*

Chief Executive Officer

Date: *3/4/2019*