

# PRIVACY POLICY

## 1 ABOUT THIS PRIVACY POLICY

The Queensland Program of Assistance to Survivors of Torture & Trauma Limited [QPASTT] respects your right to privacy. We are committed to complying with our obligations, under the *Privacy Act* 1988 (Cth). This Privacy Policy outlines how we collect, hold, use and disclose your personal information.

## 2 CONSENT

When you provide personal information to us, you consent to our collection, hold, use and disclosure of your personal information in accordance with this Privacy Policy and any other arrangements that may apply between us.

## 3 CHANGES TO THIS PRIVACY POLICY

If we make changes to this Privacy Policy, we will update the policy on our website. When you use our website, our services, or you provide us with personal information, you acknowledge that you have read and agree to the revised Privacy Policy. Please check our Privacy Policy regularly for updates and amendments. If you are engaged in a current service, the QPASTT worker will notify you of changes (e.g., counselling clients).

## 4 WHAT PERSONAL INFORMATION DO WE COLLECT AND HOLD?

- (1) If you are using our service, we may collect the following kinds of personal information about you:
  - (a) your contact details as well as information like your age, your job and country of origin
  - (b) information related to your experiences before coming to Australia. This will help us to provide a service that meets your needs; and
  - (c) other personal information you voluntarily provide to us, for example when making inquiries about our services, or providing details about a complaint.
- (2) If you apply for employment with us, we may also collect information about your qualifications, employment history and membership of professional associations.

## 5 HOW DO WE COLLECT AND HOLD PERSONAL INFORMATION?

- (1) We usually collect personal information directly from you or if someone refers you to our service. We also collect personal information over the phone, in person, or in any other manner, including through email.
- (2) We collect personal information:
  - (a) when you, or someone referring you, communicates with us;
  - (b) when you make inquiries about us or our services;
  - (c) when you contact us for any other reason including asking questions or making complaints;
  - (d) when you use our website;
- (3) We may also collect personal information
  - (a) when you register for any trainings or activities or attend any events,

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(b) when you apply for employment with us. This includes collecting personal information about you from recruitment agencies, your former employers, your referees, and your educational institutions (either current or former).

(c) when you make a referral; or

(d) when you subscribe to a newsletter, fill out a form, or survey, enter or participate in any research.

## **6 WHAT HAPPENS IF YOU DO NOT PROVIDE YOUR PERSONAL INFORMATION TO US?**

If you do not provide personal information that we request, we may not be able to provide some or all of our services to you or be able to respond and assist. We may also not be able to provide you with information about services that you may want. If you are applying for employment with us, we may be unable to fully consider your application.

## **7 WHY DO WE COLLECT, USE, HOLD AND DISCLOSE YOUR PERSONAL INFORMATION?**

We may collect, use, hold and disclose your personal information for the following purposes:

- (1) to provide information relating to our services, and to deliver services to you and other clients as part of our day-to-day operations.
- (2) to record, use and disclose information regarding services we provide you and to provide further services to you such as third party services that we believe will assist in your development and recovery;
- (3) to assist in providing, and developing, services to you by tailoring them to meet your needs;
- (4) if you are applying for employment with us, to consider your application for a particular role and to determine whether you have previously applied to us and to assess your suitability for other employment opportunities;
- (5) to update our records and keep your contact details up to date;
- (6) to process and respond to any complaint made by you;
- (7) to resolve any disputes that we may have with you, and enforce our agreements with third parties;
- (8) to comply with any law, rule or regulation; and
- (9) any other purpose which is stated to you when we collect your personal information or that you otherwise authorise.

## **8 HOW DO WE HOLD YOUR PERSONAL INFORMATION?**

- (1) We will take steps that are reasonable in the circumstances to protect your personal information from loss, misuse, interference, unauthorised access, modification or disclosure.
- (2) As our website is linked to the internet, and the internet is inherently insecure, we cannot guarantee the security of information you communicate to us online. Any personal information or other information which you transmit to us online is transmitted at your own risk.
- (3) Our internal database contains personal information, however there is no public access and access within QPASTT is restricted on a user basis.

## **9 WHO WILL WE DISCLOSE YOUR PERSONAL INFORMATION TO?**

We may disclose personal information to the following parties:

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- (1) third party service providers such as:
  - (a) providers who we think will assist in your development and recovery;
  - (b) contractors who help us to provide services to you;
- (2) our professional advisers, including our accountants, auditors, and legal advisers;
- (3) our insurers;
- (4) payment systems operators (e.g. banks or merchants receiving credit card payments);
- (5) anyone to whom our assets or businesses (or any part of them) are transferred;
- (6) any entity where required or authorised by or under a law or a court or tribunal; and
- (7) government agencies, courts, regulatory bodies, and law enforcement agencies, or as required, authorised, or permitted by law; or
- (8) any other recipient which is notified to you at the time of collection or that you otherwise authorise.

## **10 DIRECT MARKETING**

- (1) We do not provide your personal information to other organisations for the purposes of direct marketing.

## **11 DO WE USE COOKIES OR OTHER WEB TRACKING SYSTEMS?**

- (1) We track traffic patterns on our website through the use of cookies. A "cookie" is a small amount of information which is transferred to the hard drive of your computer and which can identify your web browser, but not you.
- (2) If you want, you can disable your web browser from accepting cookies. If you do so, you can still access our website, but not all services may be available.
- (3) We may automatically collect general statistical information on our website about visitors to our website, such as IP addresses, browsers used, dates visited, pages visited and number of visitors. However, such information does not refer to you by name or your contact details. We use this data in aggregate to improve our website. We may provide such aggregated data to third parties, but in so doing, we do not provide personal information without your consent.
- (4) Our website or other online presence may contain links to a variety of third party websites. Some of these links may request or record information from users or use cookies or other methods to collect information from you. We have no control over the content or personal information management of these sites. We encourage you to review the privacy policies of these sites before engaging in any activity with them. Our website may use Google services such as Google Analytics from time to time. For more about how Google collects and processes data, and your privacy choices with Google, please see Google's privacy policy and their information [here](#).

## **12 HOW DO YOU ACCESS AND CORRECT YOUR PERSONAL INFORMATION?**

- (1) You have the right to access your personal information which we hold about you, subject to some exceptions.

- (2) Before we provide you with access to your personal information we may require some proof of identity. If you wish to access the personal information we hold about you, please contact us using the contact details provided below.
- (3) You also have the right to request that we correct any inaccurate personal information we hold about you, subject to some exceptions. If you wish to correct the personal information we hold about you, please contact us using the contact details provided below.
- (4) If we do not agree to your request to provide you with access to your personal information or to amend your personal information, we will inform you of our decision within a reasonable period. If you wish to complain about this outcome or to attach a statement to your record that you believe the personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading, please see our complaints procedure below.

### **13 HOW DO YOU MAKE A COMPLAINT?**

- (1) You may request further information about the way we manage your personal information, or make a complaint if you believe that we have breached your privacy, by contacting our Privacy Officer using the contact details below.
- (2) We treat your complaint confidentially and respond to you within a reasonable time. We will investigate and provide a response to you within a reasonable time, provided that we have all necessary information and have completed any investigation required. In some cases, we may need to ask you to put your complaint in writing so that we are sure that we understand it, and may also need to ask you for further information or to verify your identity. For further information, please refer to the QPASTT Complaints Policy.
- (3) If you are dissatisfied with the outcome, you may take your complaint to the Privacy Commissioner at the Office of the Australian Information Commissioner (**OAIC**). The contact details for the OAIC are available from the OAIC's website at [www.oaic.gov.au](http://www.oaic.gov.au).

### **14 CONTACT DETAILS**

If you have any questions about this Privacy Policy, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please contact the QPASTT Privacy Officer on:

- (1) E-mail: [connect@qpastt.org.au](mailto:connect@qpastt.org.au) or
- (2) Telephone: 33716677; or
- (3) Post: 28 Dibley Street Woolloongabba 4102.

*Please contact QPASTT for the short and simple version of the QPASTT Privacy Policy.*