

# **Privacy Policy**

### What is personal information?

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

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

The types of personal information we collect may include your name, date of birth, gender, contact information, credit/debit card information, health information and other information about your history with, or relationship to Hutt St Centre and the circumstances which lead you to use our services.

### Whose personal information do we collect?

We collect personal information from people who are connected to our operations and activities – including people who use our services, employees, donors, volunteers, sponsors, health professionals, suppliers, and service providers.

### How do we collect your personal information?

Where possible, we will collect your personal information directly from you. This may be in person (for example, through Intake and Assessment or case management or when you access other services such as meals at Hutt St Centre, when you make a donation, volunteer at Hutt St Centre or attend an event), on the telephone (for example, if you contact Hutt St Centre about services, opportunities or activities), or online (for example, if you make a donation, enquiry or sign up for an event online).

# Why do we collect your personal information?

We may collect your personal information for a number of purposes, including:

- <u>Support services</u>: to provide you with information and support services, and to evaluate and report on these services
- <u>Health promotion</u>: to provide you with information about homelessness and other health factors that may impact on homelessness such as mental and physical health issues.
- Marketing: to communicate with you about services, donations, products, services, campaigns, causes and events
- <u>Statistics</u>: to understand the demographics of our clients, supporters, volunteers and donors in order to provide the most relevant information in the most appropriate manner
- <u>Projects</u>: to provide you with information about projects, and to evaluate and report on these services via feedback from participants and stakeholders
- <u>Volunteering and other support</u>: to enable you to assist us with volunteering, community fundraising, advocacy and other activities where we seek the community's assistance
- Other issues: communicating with you in relation to our operations, activities and objectives, to verify your identity, to improve and evaluate our programs and services and to comply with relevant laws.

Where we collect your personal information for a specific purpose not outlined above, we will provide you with a collection notice which explains the primary purpose and any related secondary purposes for which we are collecting your personal information.

#### Health information and other sensitive information

As part of administering our services, we may collect health information and other sensitive information. For example, we may collect medical history information from you, if you are using particular services, participating in a specific activity or volunteering. We may also require information via a police check if you are volunteering for various programs at Hutt St Centre.

### What happens if you don't provide all this information?

If you do not provide some or all of the personal information requested, we may not be able to offer or provide you with information about our services, causes, events, programs and projects or offer you employment or volunteering opportunities.

## Using a pseudonym or engaging with us anonymously

Where practicable, you will be given the opportunity to engage with us on an anonymous basis, or using a pseudonym.

# Website usage information and cookies

When you access our website, we may use software embedded in our website (such as Javascript) and we may place small data files (or cookies) on your computer or other device to collect information about which pages you view and how you reach them, what you do when you visit a page, the length of time you remain on the page, and how we perform in providing content to you.

A cookie does not identify individuals personally, but it does identify computers. You can set your browser to notify you when you receive a cookie and this will provide you with an opportunity to either accept or reject it in each instance.

We may gather your IP address as part of our business activities and to assist with any operational difficulties or support issues with our services. This information does not identify you personally.

We use Google Analytics features based on Remarketing, Google Analytics Demographics, and Interest Reporting. These features use first-party and third-party cookies to inform and optimise content based on your past visits to our site.

Google Analytics informs us of how visitors use our site based on your browsing habits, so that we can improve our site to make it easier for you to find the information you are seeking. Google also receives this information as you browse our site and other websites on the Google Display Network using Remarketing.

If you would like to optout of customised Google Display Network services and Google Analytics for Display Advertising you can use Ad Settings. You can also use the Google Analytics Optout Browser Addon so you are not tracked into Google Analytics.

# Opting out of direct marketing communications

Where we use your personal information to send you marketing and promotional information by post, email or telephone, we will provide you with an opportunity to opt-out of receiving such information. By electing not to opt-out, we will assume we have your implied consent to receive similar information and communications in the future. We will always ensure that our opt-out notices are clear, conspicuous and easy to take up.

If you do not wish to receive direct marketing communications from us, please contact us at Hutt St Centre 258 Hutt St, Adelaide SA 5000, Tel: + 61 8 8418 2511 and email: dchutt@huttstcentre.org.au

### To whom does Hutt St Centre disclose your personal information?

We may need to disclose your personal information to others in order to carry out our activities. This may include:

- External support services: to health care professionals, other professionals, counsellors, service providers, agencies that provide support services. You personal Information will only be provided with your expressed permission.
- Contractors and service providers who perform services on our behalf, such as mailing
  houses, printers, information technology services providers (including offshore cloud
  computing service providers), and database contractors. The information we share with these
  will not be stored, used or shared by those parties.
- Hutt St Centre Board members, staff and relevant program managers who may need to
  contact you to update your information, arrange volunteer opportunities or provide receipts for
  donations and supporter activities.

Wherever we propose to disclose your personal information to a third party not outlined above, we will provide only with your expressed permission.

## Where is your personal information stored?

We take all reasonable steps to protect all of the personal information we hold from misuse, interference and loss, and from unauthorised access, modification or disclosure. Your personal information will be stored on a password protected electronic database, which may be on our database, a database maintained by a cloud hosting service provider or other third party database storage or server provider. Backups of electronic information are written to drives which are stored offsite.

Hard copy information is generally stored in our offices, which are secured to prevent entry by unauthorised people. Any personal information not actively being used is archived, usually for 7 years, with a third party provider of secure archiving services.

Where personal information is stored with a third party, we have arrangements which require those third parties to maintain the security of the information. We take reasonable steps to protect the privacy and security of that information, but we are not liable for any unauthorised access or use of that information. Your personal information will stay on the database indefinitely

until you advise you would like it removed, unless we de-identify it or destroy it earlier in accordance with privacy law requirements.

#### Your direct debit or credit cards

We use Secure Socket Layer (SSL) certificates which is the industry standard for encrypting your credit card and debit card numbers, your name and address so that it cannot be viewed by any third party over the internet. Your financial information is encrypted on our servers and access to this information is restricted to our authorised staff only.

### Access to your personal information

We will, upon your request, and subject to applicable privacy laws, provide you with access to your personal information that is held by us. However, we request that you identify, as clearly as possible, the type(s) of information requested. We will deal with your request to provide access to your personal information within 30 days and you agree we may charge you our reasonable costs incurred in supplying you with access to this information.

Your rights to access personal information are not absolute and privacy laws dictate that we are not required to grant access in certain circumstances such as where:

- access would pose a serious threat to the life, safety or health of any individual or to public health or public safety
- access would have an unreasonable impact on the privacy of other individuals
- the request is frivolous or vexatious
- denying access is required or authorised by a law or a court or tribunal order
- access would be unlawful, or
- access may prejudice commercial negotiations, legal proceedings, enforcement activities or appropriate action being taken in respect of a suspected unlawful activity or serious misconduct

If we refuse to grant you access to your personal information, we will provide you with reasons for that decision (unless it is unreasonable to do so) and the avenues available for you to complain about the refusal.

## Updating your personal information

You may ask us to update, correct or delete the personal information we hold about you at any time. We will take reasonable steps to verify your identity before granting access or making any corrections to or deletion of your information. We also have obligations to take reasonable steps to correct personal information we hold when we are satisfied that it is inaccurate, out- of-date, incomplete, irrelevant or misleading for the purpose for which it is held.

If you require access to, or wish to update your personal information, please contact us at Hutt St Centre 258 Hutt St, Adelaide SA 5000 Tel: + 61 8 8418 2511 and email: dchutt@huttstcentre.org.au

# **Complaints**

If you have any queries or would like to make a complaint regarding relating to our Privacy Policy or the manner in which we handle your personal information, please contact our Chief Executive Officer Ian Cox, on 08 8418 2500 or email <a href="mailto:dchutt@huttstcentre.org.au">dchutt@huttstcentre.org.au</a>. We endeavour to respond to complaints and queries within fourteen days of their receipt. If you are dissatisfied with our response, you may refer the matter to the Australian Information (Privacy) Commissioner (see www.oaic.gov.au).