



ABN 64668702471
Fearlesswomen.org.au

Fearless Women: Privacy Policy

1. Introduction

Fearless Women is committed to protecting your privacy. We respect the privacy of your information and manage it according to the law. The law regulates how your information is handled throughout its life cycle, from collection to use and disclosure, storage, accessibility and disposal.

2. What is Personal Information

Personal Information collected by Fearless Women is protected under the *Privacy Act 1988 (Commonwealth)* (the Act) as amended by the *Privacy Amendment (Private Sector) Act 2001 (Commonwealth)* including the Australian Privacy Principles and the Health Records (Privacy and Access) Act 1997 (ACT). Fearless Women is required also to comply with any other relevant state or territory privacy legislation. A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at <https://www.oaic.gov.au/>. 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.

This includes information such as your name, date of birth or contact details, and may include any recorded communication we may have had in our dealings with you.

3. What is Sensitive Information

Sensitive Information is a subset of personal information and consists of information or opinions about your racial or ethnic origin, political opinions, memberships (including trade unions or associations), religious beliefs, sexual orientation, health or criminal records. For the full list, please see refer to the Act.

4. Why we collect your Personal Information

Personal Information will be used by us only:

- For the primary purpose for which it was obtained

- For a secondary purpose that is directly related to the primary purpose
- With your consent, or where required or authorised by law.

Please note that if Fearless Women is served with a Subpoena by a court or tribunal to provide information, Fearless Women must do so. Likewise, as a Mandatory Reporter, Fearless Women is required by law to immediately report child physical and sexual abuse to Child and Youth Protection Services (CYPS).

For these people:	We collect this personal information about them:	To use and disclose it for:
Clients	<p>May include (but is not limited to) your name, address, date of birth, telephone numbers, occupation and email address. In some cases, with your consent (for example, if you apply to register as a volunteer), we may also collect health information about you and your criminal history.</p> <p>The client usually provides this information to us at the commencement of a business relationship. However, we may collect information about client personnel from other public or non-public sources.</p>	<p>The primary purpose for collecting information from you is to provide services in accordance with the objectives of Fearless Women (link to website page with organisational aims, which should <u>match</u> Constitution), conduct our general business activities and to update you on other Fearless Women specific activities that may be of interest to you.</p> <p>Business Development and Marketing</p>
Prospective clients		
People who attend our events	<p>May include (but is not limited to) your name, contact details, occupation and employer name</p>	<p>Business Development and Marketing</p>
People who subscribe to our newsletter or other distributed publication		
People who work for our business partners, sponsor organisations and supplier organisations	<p>Business address, title, organisation and contact information</p>	<p>Building and managing our commercial relationships with our partners and suppliers</p>
Individual suppliers		
Prospective employees and volunteers	<p>Information provided by the person (eg a job application, including a referee report), on behalf of the person (eg by a recruitment agency) information provided by other people, eg current Proximity staff</p>	<p>The primary purpose for collecting information from you is to provide services in accordance with the objectives of Fearless Women (link to website page with organisational aims, which should <u>match</u> Constitution), conduct our general business activities and to update you on other Fearless Women specific activities that may be of interest to you.</p> <p>Your information may be used to/for: assess your application; research to assist with program development, provide you with information; report to government or other funding bodies on how funding is used; process your donation and provide a receipt; respond to your enquiry; comply with our reporting obligations and/or enable Fearless Women to retain appropriate information to deal with any future legal liability which may arise in relation to its volunteers' work with young people. It may also be used for any other purpose for which it was requested and to which you were advised or provided consent. Information may further be used for directly related purposes.</p>
Referees for prospective employees	<p>Written or oral referee reports</p>	

Current and past employees	Personnel records information from applications for security clearance, criminal history checks or other checks required by our clients, and the high-level results (ie a security clearance granted, or a clear criminal history check)	Managing the employment relationship
People who browse our website	See section 9 below	

5. Third Parties

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case, we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

Any agencies, individuals, or other entities such as (but not limited to) past or present employers, educational institutions, law enforcement agencies, social services, and other such entities with which you have had contact, may release any information about, or relating to, you as requested by Fearless Women which may be relevant to your involvement with Fearless Women.

6. Data security

Fearless Women has comprehensive information and data protection processes in place to ensure confidentiality and privacy, and to maintain privilege over communications. We use secure cloud-based ICT systems, primarily based on Microsoft Azure and Office 365 platforms. Most systems have data hosted in Australia. Some Microsoft services are hosted in the Asia-Pacific region, with a migration path to Australian hosting. All Fearless Women employees and contractors are required to comply with our strict guidelines in the secure handling of all information. This includes ensuring all client confidential information is kept strictly confidential in line with each client's requirements.

7. Overseas disclosure

If we use IT development partners overseas. Sometimes a copy of data containing some personal information is temporarily sent there for use in system development or testing, under contractual arrangements that require security and confidentiality of that data.

8. Archiving and document destruction

Fearless Women does not retain client or matter-related records in hard copy. This eliminates many risks associated with the use of hard copy records, including physical loss, destruction, theft, space requirements and lack of traceability. Hard copy material is used for temporary purposes only. All hard copy material, even if not confidential, is securely disposed of through our secure document destruction process.

9. Using our website

We may use cookies, Google Analytics or other technology to track visits to our website to monitor its effectiveness, maintain our server and improve our services. Please also note that when you use this website our Internet Service Provider (ISP) may make a record of your visit and log your server address, your domain name, the date, time and duration of your visit, the pages and documents you accessed, the previous site you had accessed (i.e., the referring URL) and the type of browser you are using.

This information is collected for statistical purposes only, and Fearless Women will not make any attempt to identify users according to their browsing activity. In the unlikely event of an investigation, a law enforcement agency or other government agency may exercise its legal authority to inspect our ISP's logs.

10. Correction of information

We do our best to ensure all personal and client data we hold is up to date, complete, relevant and appropriate in the case of disclosure.

If we believe information to be wrong, misleading, or out of date, we will take reasonable steps to correct this information and notify third parties (if you notify us and it is reasonable and practicable for us to do so).

You can request a change of information by contacting us on our details below. However, we are under no obligation to change this information if it is found to be correct. If we do not agree with changes you have requested, we will tell you why in writing (unless the law allows us to not specify a reason). You may request that we associate a statement from you about the information

11. Access to your personal information

You may request access to Personal Information about you that we hold using the contact details provided below.

If we refuse to provide this information to you, we will explain the reasoning in writing (unless the law permits otherwise), for example if you cannot prove your identity.

12. Marketing

From time to time, we send out marketing communications in the form of email communications, postal mailouts or SMS text messages. Fearless Women maintains compliance in every electronic marketing communication in line with *the Spam Act 2003* (Cth) to ensure that recipients do not receive large volumes of unnecessary unsolicited communications, and have the option of unsubscribing in accordance with the *Spam Act 2003* (Cth).

13. Enquiries & complaints

If you have any concerns or complaints about a breach of this policy, please contact Fearless Women. This should be done within a reasonable time from when you first become aware of a breach of the Fearless Women Privacy Policy. Please identify the conduct that is the basis for the complaint and be as specific as possible about the details of the grievance. If you are not satisfied that your complaint has been adequately handled by Fearless Women, you may refer the matter to the Office of the Federal Privacy Commissioner.

- Phone: 0409545963
- Email: admin@fearlesswomen.org.au
- Write: Fearless Women at the address listed on its website

14. Changes to this policy

We encourage you to check this policy periodically as it may change from time to time. Any updates made will be available on our website.

Definitions:

Mandatory Reporter: refers to the legal requirement of certain groups of people to report a reasonable belief of child physical or sexual abuse.

Subpoena: an order to a person (called the addressee) requiring the addressee to attend at Court to give evidence, produce a document or thing to the Court or do both things.

Date: 04 February 2022

Authorised: CEO

Review: February 2024