



## PRIVACY POLICY

Policy number	001	Version	1
Drafted by	Secretary	Approved by Board on	13.12.2018
Responsible person	President	Scheduled review date	31.12.2020

### INTRODUCTION

The Board of RSL Maleny Sub Branch Inc. is committed to protecting the privacy of personal information that the organisation collects, holds and administers. Personal information is information that directly or indirectly identifies a person.

### PURPOSE

The purpose of this document is to provide a framework for RSL Maleny Sub Branch Inc. in dealing with privacy considerations.

### POLICY

RSL Maleny Sub Branch Inc. collects and administers a range of personal information for the purpose of supporting veterans and their families. The organisation is committed to protecting the privacy of personal information it collects, holds and administers.

RSL Maleny Sub Branch Inc. recognises the essential right of individuals to have their information administered in ways that they would reasonably expect – protected on one hand, and made accessible to them on the other. These privacy values are reflected in and supported by our core values and philosophies and also reflected in our Privacy Policy, which is compliant with the Commonwealth Privacy Act (1988).

RSL Maleny Sub Branch Inc. is bound by laws that impose specific obligations when it comes to handling information. The organisation has adopted the following principles contained as minimum standards in relation to handling personal information.

RSL Maleny Sub Branch Inc. will

- Collect only information which the organisation requires for its primary function;
- Ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered;
- Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent;
- Store personal information securely, protecting it from unauthorised access; and
- Provide stakeholders with access to their own information, and the right to seek its correction.

### AUTHORISATION

  
President

Date: 13/12/2018



## PRIVACY PROCEDURES

Procedures number	001	Version	1
Drafted by	Secretary	Approved by CEO on	
Responsible person	President	Scheduled review date	

### RESPONSIBILITIES

RSL Maleny Sub Branch Inc.'s Board is responsible for developing, adopting and reviewing this policy.

RSL Maleny Sub Branch Inc.'s President is responsible for the implementation of this policy, for monitoring changes in Privacy legislation, and for advising on the need to review or revise this policy as and when the need arises.

### PROCESSES

#### Collection

RSL Maleny Sub Branch Inc. will:

- Only collect information that is necessary for the performance and primary function of RSL Maleny Sub Branch Inc.
- Notify stakeholders about why we collect the information and how it is administered.
- Notify stakeholders that this information is accessible to them.
- Collect personal information from the person themselves wherever possible.
- If collecting personal information from a third party, be able to advise the person whom the information concerns, from whom their personal information has been collected.
- Collect sensitive information only with the person's consent. (Sensitive information includes health information and information about religious beliefs, race, gender and others).
- Determine, where unsolicited information is received, whether the personal information could have been collected in the usual way, and then if it could have, it will be treated normally. (If it could not have been, it must be destroyed, and the person whose personal information has been destroyed will be notified about the receipt and destruction of their personal information).

#### Use and Disclosure

RSL Maleny Sub Branch Inc. will:

- Only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose.
- For other uses, will obtain consent from the affected person.
- In relation to a secondary purpose, use or disclose the personal information only where:
  - a secondary purpose is related to the primary purpose and the individual would reasonably have expected us to use it for purposes; or
  - the person has consented; or



- certain other legal reasons exist, or disclosure is required to prevent serious and imminent threat to life, health or safety.
- In relation to personal information which has been collected from a person, use the personal information for direct marketing, where that person would reasonably expect it to be used for this purpose, and RSL Maleny Sub Branch Inc. has provided an opt out and the opt out has not been taken up.
- In relation to personal information that has been collected other than from the people themselves, only use the personal information for direct marketing if the people whose personal information has been collected have consented (and they have not taken up the opt-out).
- Provide all individuals access to personal information except where it is a threat to life or health or it is authorized by law to refuse and, if a person is able to establish that the personal information is not accurate, then RSL Maleny Sub Branch Inc. must take steps to correct it. RSL Maleny Sub Branch Inc. may allow a person to attach a statement to their information if RSL Maleny Sub Branch Inc. disagrees it is inaccurate.
- Where for a legal or other reason we are not required to provide a person with access to the information, consider whether a mutually agreed intermediary would allow sufficient access to meet the needs of both parties.
- Make no charge for making a request for personal information, correcting the information or associating a statement regarding accuracy with the personal information.

#### **Storage**

RSL Maleny Sub Branch Inc. will:

- Implement and maintain steps to ensure that personal information is protected from misuse and loss, unauthorized access, interference, unauthorized modification or disclosure.
- RSL Maleny Sub Branch Inc. will have systems which provide sufficient security for handling personal information.
- Ensure that RSL Maleny Sub Branch Inc.'s data is up to date, accurate and complete.

#### **Destruction and de-identification**

RSL Maleny Sub Branch Inc. will destroy personal information once it is not required to be kept for the purpose for which it was collected, including from decommissioned computers and devices.

#### **Data Quality**

RSL Maleny Sub Branch Inc. will take reasonable steps to ensure the information RSL Maleny Sub Branch Inc. collects is accurate, complete, up to date, and relevant to the functions we perform.

#### **Data Security and Retention**

RSL Maleny Sub Branch Inc. will only destroy records in accordance with the organisation's *Records Management Policy* and guidance from Queensland State Archives (QSA) General Retention and Disposal Schedule (GRDS).

#### **Openness**

RSL Maleny Sub Branch Inc. will:

- Ensure stakeholders are aware of RSL Maleny Sub Branch Inc.'s Privacy Policy and its purposes.
- Make this information freely available in relevant publications and on the organisation's website.

#### **Access and Correction**

RSL Maleny Sub Branch Inc. will ensure individuals have a right to seek access to information held about them and to correct it if it is inaccurate, incomplete, misleading or not up to date.

#### **Anonymity**

RSL Maleny Sub Branch Inc. allows people from whom the personal information is being collected to not identify themselves or use a pseudonym unless it is impracticable to deal with them on this basis.

**Making information available to other organisations**

RSL Maleny Sub Branch Inc. can release information to third parties where it is requested by the person concerned.

**Related Documents**

- RSL Maleny Records Management Policy

**Authorisation**



Clarke Alexander

President

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