

# Guide Dogs.

## POL 1002 Privacy Policy

### Organisational

#### Our Commitment

Guide Dogs Queensland (GDQ) is a registered charity, which engages in a number of activities including fundraising, marketing and service delivery to Queenslanders who are blind or have low vision.

This policy supports GDQ's need to collect and handle personal information and the right of the individual to privacy. It ensures that GDQ can collect personal and sensitive information necessary for its services and functions, while recognising the right of individuals to have their information handled in ways that they would reasonably expect and in ways that protect the privacy of their personal information.

Our Privacy Policy has been developed in accordance with the Australian Privacy Principles and Privacy Act 1988.

#### Application

This policy applies to all volunteers, contractors and employees of GDQ or anyone handling personal information on behalf of GDQ.

#### What We Will Do

##### 1. The kinds of information we hold and collect

GDQ collects personal and sensitive information from clients/beneficiaries, donors, business partners, members, online users and its people (volunteers, employees, delegates and candidates for volunteer work and prospective employees) in order to deliver the services it provides.

We collect information relevant and necessary to our relationship with you.

For prospective employees and volunteers, we may collect personal information and opinions from referees, pre-employment health information and conduct Criminal History Checks. Information relating to unsuccessful candidates for employment or volunteer work will be stored securely for reference as required to provide feedback to the applicant or, with the applicant's consent, for consideration of other opportunities within GDQ. This information will otherwise be destroyed after 18 months.

If you would like to access any GDQ services anonymously or using a pseudonym, please inform us. If it is possible and lawful, we will take all responsible steps to comply with your request. However, we may not be able to provide the supports or services in question if we are not provided with the personal information requested.

## **2. How GDQ collects and holds personal information**

### **Collection of information**

We will collect personal information from you by lawful and fair means. We may collect personal information from you through a variety of different methods including:

- Complete a GDQ Form;
- Deal with us over the phone;
- Email us;
- Ask us to contact you after visiting our website or other online platform such as social media, including Facebook, Twitter, Instagram and LinkedIn;
- Other activities such as purchasing of a product;
- Visit our site;
- Have contact with us in person; or
- Apply for a position.

We may also collect information about you from other persons/organisations for relevant business purposes, where you have consented to the collection and provision of this information, for example such as:

- Medical records from health professional/government/agency;
- Records from another Guide Dog School; or
- Funding records from government/agency.

We do not collect any private or sensitive information, such as racial or ethnic origin, health, political opinions or membership, religious or philosophical beliefs, trade association or union membership, sexual preferences or criminal record), unless:

- The individual has consented (e.g. Police background checks on potential persons who will be working with clients and/or children, or details required to provide effective service to clients), or
- The collection is required by law, or
- The collection is necessary to prevent a serious and imminent threat to the health and safety of a person, or
- The collection is necessary for the establishment, exercise or defence of a legal claim.

### **Unsolicited information**

Should we ever receive unsolicited personal information about you which we did not ask you for, we will assess it in the following manner:

- i. If we could not have collected the information from you by reasonable means; and
- ii. The information does not form part of Commonwealth record, then

We will de-identify or destroy the information accordingly.

### **Children under age 18**

When we are required to collect personal information from children under the age of 18, we will seek consent from the parents/guardians for the collection of this information.

### **Hold and Use of information**

GDQ has procedures in place to limit access to your personal information to only those employees with a business reason for knowing such information.

All GDQ staff members are obliged to respect the confidentiality of any personal or sensitive information held by GDQ and we keep personal information only for as long as it is required for business purposes or as required by the law.

Donor/Customer/Client information will not be released to any other organisation, person or body without the consent of the individual.

When we no longer need your personal information and are not required to keep it, we will take reasonable steps to de-identity and destroy it.

## **3. Purpose of collection, hold, use and disclosure of personal information**

We will only use or disclose your personal information for the primary purposes for which it was collected or as consented to and/or as set out below.

Personal Information provided to GDQ will be used for the following primary purposes:

- To verify your identity where required;
- To provide customer service functions, including handling enquiries and complaints;
- To fulfil obligations under any sale and purchase contract/arrangement and/or any other contract between the individual and GDQ;
- To engage with you/or provide any of our goods or services to you (as applicable), including but not limited to mobility, counselling, support services, volunteering and fundraising;
- To provide information to you about programs, products, services and/or special offers;

- To obtain your opinion or comments about any program, products and/or services; which allows us to improve, develop and maintain services, products, programs, business systems and infrastructure;
- For marketing, events, and promotional activities by GDQ (including contact by direct mail, telemarketing, email, SMS and MMS messages);
- Fundraising, including the processing of donations and grants;
- Your employment (or potential employment) with us; and
- Our compliance with applicable laws.

#### **4. Accessing and updating your personal information**

##### **Access**

You have the right to access your personal information, subject to certain exceptions provided by law.

For security reasons, you will be required to put your request in writing and provide proof of your identity before accessing your personal information. We also ask that you identify, as clearly as possible, the type/s of information requested. GDQ will deal with your request to provide access to your personal information in a reasonable time – usually within 30 days of receipt of your request.

If we are unable to provide you with access to your personal information for any reason, we will write to you to confirm such reasons for this decision and provide you with alternate options regarding our complaints handling process.

##### **Updating your personal information**

It is inevitable that some personal information which we hold will become out of date. We will take reasonable steps to ensure that the personal information which we hold remains accurate and, if you advise us of a change of details, we will amend our records accordingly.

You can correct your information, for example, when you change your address etc. through a number of methods such as contacting GDQ via email, web contact, in writing, completion of forms or by telephone request.

GDQ will never charge you a fee to update the information.

#### **5. Cross-border disclosure**

Some functionality of the GDQ website is not run by GDQ and third parties may capture and store your personal information outside Australia. These third parties include (but are not limited to) Facebook, YouTube, MailChimp, SurveyMonkey, Twitter and Google and may not be subject to the Privacy Act.

## **6. Use of our website**

We may collect non-personal information from you such as browser type, operating system, and web pages visited to help us manage our web site.

## **7. We use Google Analytics to track visits to our website, and use this information to track the effectiveness of our website, including number of visits, length of visit, viewed pages and the technical capabilities of our visitors. While this data is mostly anonymous, sometimes we will connect it to you, for instance in personalising a webpage, or pre-filling a form with your details.**

### **Marketing**

As GDQ receives minimal government funding, we depend on financial support from the community to continue providing our services to blind and low vision Queenslanders. This means it is necessary for GDQ to undertake a range of fundraising and marketing activities.

When you receive marketing information from us, at all times we will ensure that you are provided with an opportunity to reply to/or tick an "opt out" box to ensure you do not receive future communications. By not choosing a clearly displayed "opt out" option, we will assume we have your implied consent to receive similar marketing communications in the future.

## **8. Data breach**

If a data breach occurs, Guide Dogs Queensland has a designated team who will promptly act to ensure your privacy information is not affected. To comply with the Notifiable Data Breach Scheme, Guide Dogs Queensland will contact you if any of your data is compromised and if a high risk is present. If GDQ is unable to contact you, a statement will be available on our website.

## **9. Contact our Privacy Officer**

Guide Dogs Queensland welcomes your questions and comments on our Privacy Policy. Should you wish to request access to your personal information, make a complaint about possible breaches of privacy, or request a copy of this policy in a different format, please direct your enquiries to:

The Privacy Officer

Guide Dogs.

07 3500 9001

Po Box 5301, Brendale, Qld, 4500

Complaints can be raised by contacting the Privacy Officer or by completing the online form available on GDQ website ([link](#)). All complaints will be treated seriously and dealt with promptly.

If you are not satisfied with how we handle your complaint you may contact the Office of the Australian Information Commissioner ([link](#)).

**Document Control**

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