

Privacy Policy

Last reviewed: 1/10/2024

Purpose and rationale

This Privacy Policy ("Policy") explains how Wesley Mission Queensland Limited ("WMQL", "we", "us") collects and handles personal information from all stakeholders including customers, employees, potential employees, contractors, suppliers and other persons with whom we interact with.

The Policy describes, generally, the types of personal information we collect, how it is collected, stored, and used, including disclosure.

Position Statement

WMQL is committed to protecting the privacy and security of our stakeholders' personal information. We believe that safeguarding personal data is crucial to maintaining trust and ensuring compliance with applicable privacy laws and regulations.

Expected Outcome

WMQL is bound by the *Privacy Act 1988* (Cth) ("Act") and the Australian Privacy Principles ("APP") that are contained in that Act.

We regularly review our policies and practices to ensure they meet legal requirements and industry standards.

Requirements

Personal Information

When used in this Policy, the term "personal information" has the meaning given to it in the Act. In general terms, "personal information" is any information that can be used to personally identify an individual. This may include name, date of birth, address, telephone number, email address, government identifiers and profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

Why we collect personal information and the information that we collect

We collect personal information for a range of purposes, including:

- a) to manage our relationship with you
- b) to provide services directly to you or on your behalf
- c) to comply with our legal and regulatory obligations; and
- d) for other purposes which you have provided your consent (e.g., WMQL Newsletters, etc)

The type of personal information we collect varies depending on your relationship with us. Some examples of the information we collect are set out in the separate sections below.

We do not sell or rent to, or trade with, any third party, the personal information we hold.

Our employees and potential employees

- a) Job applicants

If you apply for a position with us, we will ask you to provide specific personal information, such as your name, a means of contacting you, such as your email address and telephone number, your qualifications

and career history. We may also ask you for other information such as your interests and the positions you are interested in.

Any personal information you give us in connection with a job application may be used to consider you for current and future employment and may be disclosed to our external advisors to assist us in the selection and recruitment process.

b) Employees

If you are an employee of WMQL, we will collect employee records and personnel files, referee reports, screening information and other information. The handling of your personal information as an employee is exempt from the Act if it is directly related to your current or former employment relationship or an employee record relating to you. We will not disclose your personal information for any other purpose, other than as required by law.

Our other stakeholders

If you are a stakeholder such as a family member/guardian of a customer, contractor, supplier or other person with whom we interact with, we may ask you to provide your specific personal information such as your name, address, business credentials and financial institution details. We may also ask for other personal information if required, depending on the circumstances. We may use any personal information you provide for the purpose for which it is collected, including compliance with our legal and regulatory obligations. We will not disclose your personal information for any other purpose, other than as required by law.

Collection of information

a) How do we collect personal information?

We may collect personal information in a number of ways, including:

- i. from you directly, e.g., in person if you visit one of our sites, correspondence (such as a letter or email), through our website, by telephone, through written or electronic means. This is always the preferred option
- ii. from a medical practitioner or another third party
- iii. information technology processes which potentially enable identification through social media platforms, cookies and IP addresses
- iv. from publicly available sources of information, such as address validation software and telephone directories or
- v. by monitoring or recording a call that you make to us in certain circumstances (we will notify you beforehand)

With your consent, we may also collect personal information from third parties including from third party companies such as law enforcement agencies and other government entities and specialist agencies that assist us in achieving our objectives. This collection of information from third parties would occur in circumstances such as during recruitment when conducting a criminal record check.

b) Information collected through our website

Some of the information that we may collect from you during your visit to our website is not personal information because it does not reveal your identity. For example, we may record your computer IP address, the date and time of your visit, the pages you viewed and any cookies, any documents you downloaded and the type of browser and operating system you used.

If collected, this information will be used and disclosed by us in anonymous, aggregated form only, for purposes including statistical and web site development. However, we reserve our right to use or disclose this information to try to locate an individual where we reasonably believe that the individual may have engaged in any unlawful or inappropriate activity in connection with our website, or where we are otherwise required or authorised by law to do so.

Anonymity

We will generally give you the option of not identifying yourself when you contact us or participate in activities or obtain services or assistance from us - unless we are authorised by law not to do so, or it is not practical or possible for us to deal with people who have not identified themselves, or who have used a pseudonym (in such circumstances we will only obtain as much personal information as is necessary to provide you with the service or assistance you require).

What happens if we can't collect your personal information

If you do not provide us with the personal information described above, some or all of the following may happen:

- We may not be able to provide the requested activities or services to you, either to the same standard or at all
- We may not be able to provide you with information about activities and services that you may want
- We may be unable to tailor the content of our websites to your preferences and your experience of our websites may not be as enjoyable or useful
- We may not be able to contact you in relation to the various activities we undertake and services we provide.

Quality and security of personal information

We take reasonable steps to ensure that the personal information we collect, use and disclose is accurate, complete and up to date. You can help us by letting us know about any changes to your personal information, such as your email address or phone number.

We store information in different ways, including in hardcopy and electronic form. We have implemented controls around technology and our organisational processes to assist us in protecting your personal information. This includes having in place confidentiality requirements for our employees, policies, systems, site access restrictions and information classification processes.

We require and expect all our employees and contractors to comply with the Act and this Policy and will take appropriate action to address any breach by an employee or contractor of an obligation under the Act or the Policy. However, we do not accept responsibility for the misuse of personal information by any third party.

While we will do our best to protect users' personal information, we cannot guarantee or warrant the security of any information transmitted online and users do so at their own risk.

You can also contact us by telephone or post.

Disclosure

We may share your personal information to:

- a) Our employees, other parts of WMQL, contractors or service providers for the purposes of operation of our website or our operations, fulfilling requests by you, and to otherwise provide services to you including, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors, consultants and other related entities
- b) Suppliers and other third parties with whom we have commercial relationships, for operations, marketing, and related purposes
- c) Any organisation for any authorised purpose with your express consent

Direct marketing materials

We may send you direct marketing communications and information about our activities and services that we consider may be of interest to you. These communications may be sent in various forms, including Australia post mail, SMS, and email, in accordance with applicable marketing laws, such as the *Spam Act 2003* (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever

practical to do so. In addition, at any time you may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using unsubscribe functions provided in the marketing communications, and we will then endeavour to make sure that we remove your name from our mailing list.

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

Use of Government-Related Identifiers

We will not use Government-Related Identifiers, such as Medicare numbers, CRNs, MyGov identifiers, DVA Card Details, etc., as a primary identifier of individuals, but may use as a secondary proof of identification method if required. We will only use or disclose such identifiers in the circumstances allowed by the Act.

Overseas Disclosure

We are unlikely to disclose personal information to overseas recipients. Overseas recipients of information may have different privacy and data protection standards. However, before disclosing any personal information to an overseas recipient, we will consider the extent to which the overseas recipient complies with the APPs or is bound by a substantially similar privacy scheme, unless the disclosure is consented to by the relevant individual or otherwise required or permitted by law.

However, we do transfer to, store, process and/or back up personal information in a number of global locations including:

- Canada
- India
- Ireland
- New Zealand
- Singapore
- United Kingdom
- United States of America

Access and correction

Please contact us if you would like to access or correct the personal information that we hold about you. We will generally provide access or make corrections, subject to some exceptions permitted by law. We will not charge a fee for providing access to you. You can make your request at privacy@wmq.org.au

We may need to refuse to grant you access to your personal information under some circumstances prescribed by the Act (for example, if providing access would be unlawful or would have an unreasonable impact upon the privacy of other individuals).

How to make a complaint or request access to your personal information

If you believe that your privacy has been breached or have a complaint about our handling of your personal information, please contact a WMQL Privacy Officer on privacy@wmq.org.au . We will investigate your complaint and provide you with a response.

We take complaints very seriously and will respond to you shortly after receiving written notice of your complaint.

Changes to this policy

If we change the way we use personal information at any time, we will update this Policy. By continuing to use our website or otherwise continuing to deal with us, you accept this Policy as it applies from time to time. The current version is always available on the webpage.