	PRIVACY POLICY			
	Document Code:	HRP-010-1	Version	V1.01
	Date Effective:	06/10/2014		
	Approved By:	Board		
Document Owner:	Executive Manager – Corporate Services			

1.0 PURPOSE

This policy describes how YMCA Perth manages the collection of personal information in an open and transparent way and protects the privacy of individuals regarding the personal information held.

2.0 SCOPE

This policy applies to the personal information of individuals that is collected and held by YMCA Perth.

For the purpose of this policy, the term **individuals** relates to YMCA Perth:

- prospective employees
- contractors
- clients
- visitors to the website.

3.0 POLICY STATEMENT

YMCA Perth is bound by the Australian Privacy Principles (APP) of the *Privacy Act 1988* and is committed to protecting the personal information held in respect of any individual, in accordance with the requirements of these Principles.

We may, in connection with particular services we offer or provide to you, make other privacy disclosures to you or seek your authority to use your personal information in ways which are different from or more specific than those stated in this policy.

In the event of any inconsistency between the provisions of this Policy and those other disclosures, the other disclosures will prevail.

4.0 POLICY

4.1 PERSONAL INFORMATION


4.1.1 WHAT IS PERSONAL INFORMATION?

Personal information is defined under the Privacy Act and includes any information or opinion, regardless of its source, which identifies an individual, or from which an individual's identity can be ascertained, whether the information is:

- a. true or not
- b. recorded in material form or not.

Personal information includes, but is not limited to:

- personal details (including name, address, telephone number or e-mail address)
- employee records
- bank account details.

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4.1.2 WHAT IS SENSITIVE INFORMATION?

Sensitive information is a special category of personal information under the Privacy Act, which can include, but is not limited to:

- race or ethnic origin
- criminal history
- health information.

4.2 COLLECTION OF PERSONAL INFORMATION

YMCA Perth will not ordinarily collect any information about you except where you provide it to us or it is provided to us with your consent. We only collect personal information necessary to perform our business functions and activities.

In certain circumstances, we may also collect personal information about you which is sensitive.

Sensitive information will only be collected with your consent, unless otherwise permitted by law.

4.3 HOW IS PERSONAL INFORMATION COLLECTED?

YMCA Perth will collect personal information directly from you when you:

- complete an application form for employment or for one of our products or services
- deal with us over the telephone or in person
- send us a letter or email
- visit our website.

We may, for purposes of security, training, or information or transaction verification, listen to and/or record telephone calls you may have with us.

4.3.1 WHAT PERSONAL INFORMATION IS COLLECTED?

The personal information collected and held will depend upon the nature of the services being provided by YMCA Perth.


The types of personal information we collect generally includes your name, address, telephone number and email address.

4.3.2 PERSONAL INFORMATION COLLECTED FROM WEBSITE

When you submit an application via the YMCA Perth website, including an application for services or for employment, we will collect more specific personal information about you such as your name, email address, telephone number, qualifications and career history.

If you do not provide us with the information sought in the required fields we may be limited in our ability to deal with your application or provide you with a product or service.

Each time the YMCA Perth website is visited, 'cookies' are used to record the date and time the site is accessed and any information read or downloaded.

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The details recorded by 'cookies' are not information that identifies the user and therefore is not personal information.

'Cookies' is a small text file placed on your computer hard drive by a web page server, which can then be accessed by our web servers. You may configure your web browser not to accept 'cookies', however this may mean that you are not able to make full use of our website.

4.3.3 PERSONAL INFORMATION COLLECTED FROM THIRD PARTIES

On occasions, we may need to collect personal information about you from third parties, such as credit reporting agencies, our business alliance partners, your agents or third party brokers.

If your consent to this collection is required by law, we will first obtain your consent prior to collecting the information.

4.4 HOW YOUR PERSONAL INFORMATION WILL BE USED AND DISCLOSED

YMCA Perth will only use or disclose available information for the purpose that:

- it was originally collected and made known to you
- you would reasonably expect
- is required or permitted by any law
- is otherwise authorised by you.

Sensitive information will be used and disclosed only for the purpose for which it was provided or for a directly related secondary purpose, unless you agree otherwise or if the use or disclosure of the sensitive information is allowed by law.

We will take all reasonable steps to ensure that personal information used or disclosed is accurate, up to date, complete and relevant, having regard to the purpose of its use and disclosure.

4.4.1 USE OF YOUR PERSONAL INFORMATION


YMCA Perth only use personal information for the purposes for which it is collected.

These purposes include:

- considering any application you make to YMCA Perth
- providing you with information, products or services requested or to maintain a relationship with you
- managing the rights and obligations of YMCA Perth in relation to external payment systems
- providing further information about or promoting YMCA Perth particular services or products.

4.4.2 USE OF YOUR PERSON INFORMATION FOR MARKETING

YMCA Perth may use your personal details, including your email address, to provide you with information specific promotions and products that may be of interest to you. We may also provide your details to other organisations for specific marketing purposes.

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If at any time you do not wish to receive marketing information, you have the option to ask us not to send you any further information about products and services and not to disclose your information to other organisations for that purpose.

You may do this by contacting YMCA Perth Privacy Officer privacy@ymcawa.org.au

4.4.3 DISCLOSING PERSONAL INFORMATION TO THIRD PARTIES

YMCA Perth may disclose necessary information to related organisations and to any agents or contractors who provide services or who act on behalf of YMCA Perth in connection with the provision of products or services to you.

These organisations may include third parties which carry out our:

- customer enquiries
- mailing operations
- billing or payroll functions
- information technology services
- marketing services
- website usage analysis.

When we collect your information, or as soon as practicable after collection, we will notify you of the purposes of collection and any third parties that we disclose your personal information to. The use and disclosure of that information will only be for the purposes of our functions or activities.

All organisations that YMCA Perth may disclose personal information to are subject to strict guidelines on how they use the personal information and are bound by specific confidentiality and non-disclosure agreements.

4.5 SECURITY OF YOUR PERSONAL INFORMATION


YMCA Perth will take all reasonable steps to ensure that any personal information collected is held securely and protected from misuse, interference and loss, unauthorised access, modification or disclosure, by ensuring the following are in place:

- controls for the physical access to information
- passwords and other electronic protection for computer and network security
- secure off-site storage and disaster recovery practices
- YMCA Staff respect the confidentiality of all information that is collected and held
- YMCA Staff are trained on information handling processes.

We maintain strict procedures and standards and take all reasonable care to prevent unauthorised access to, and modification and disclosure of, your personal information.

We will take all reasonable steps to protect your personal information from misuse and loss.

If we no longer need your information for any purpose, we will destroy or de-identify it, subject to any obligations for us to retain information as required by law.

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4.5.1 INTERNET SECURITY

YMCA Perth protect the security of your personal information when transmitted over the Internet.

A Secure Socket Layer (SSL) is used to transfer personal information between you and our web servers with relation to online payment details, and GPG encryption when we transfer data to third parties.

However no data transmission over the Internet can be guaranteed as fully secure and accordingly, we cannot guarantee or warrant the security of any information you send to us using our on-line forms or products.

Information submitted over the Internet is done so at your own risk.

4.6 ACCESS AND CORRECTION OF PERSONAL INFORMATION

YMCA Perth takes all reasonable precautions to ensure the personal information we collect is complete, accurate and up to date. However, the accuracy of personal information depends largely on the information you provide to us.

You have the right to access your personal information, subject to some exceptions. If you would like to access your personal information, or request the information be corrected or amended, please contact the YMCA Privacy Officer.

4.7 COMPLAINTS OF A BREACH OF PRIVACY

Privacy laws give individuals the right to complain if they think an organisation has breached their privacy rights and to seek redress.

4.7.1 IF YOU HAVE A COMPLAINT

You may make a complaint if you believe that there has been a breach of privacy or if you do not agree with a decision made by YMCA Perth regarding access to your personal information.

Complaints can be made either verbally or in writing and YMCA Perth will endeavour to resolve the complaint.

4.7.2 UNRESOLVED COMPLAINTS

If you are not satisfied with YMCA Perth's decision regarding a complaint, a formal written complaint can be directed to the Australian Information Commissioner at:

Office of the Australian Information Commissioner
GPO Box 5218,
Sydney NSW 2001 Phone toll free: 1300 363 992
TTY: 133 677 then ask for 1300 363 992
email: enquiries@oaic.gov.au

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4.8 YMCA PERTH PRIVACY CONTACT

If you have any questions or concerns regarding this policy, or your rights under this policy, please contact:

YMCA Perth Privacy Officer:

Mail: PO Box 2155, Carlisle North. WA, 6101

Telephone: (08) 9473 8400

Facsimile: (08) 9472 7522

Email: privacy@ymcawa.com.au

4.9 ACCEPTANCE OF PRIVACY POLICY

You acknowledge and accept that your use of the website indicates acceptance of the terms and conditions of use and this privacy policy.

4.10 CHANGES TO THIS PRIVACY POLICY



This statement sets out the current YMCA Perth Privacy policy. It replaces any prior privacy policies or website privacy policy.

Please note we may amend or replace this policy or it may change from time to time.

We encourage you to periodically review our privacy policy for any changes.

5.0 RELATED DOCUMENTS

5.1 YMCA PERTH DOCUMENTS

-  HRP019 Complaints Handling Policy
-  HRP019 Complaint Lodgement Form

5.2 LEGISLATIVE DOCUMENTS

-  Privacy Act, 1988
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6.0 DEFINITION OF TERMS

Term	Definition
Cookies	A 'cookies' is a small text file placed on your computer hard drive by a web page server, which can then be accessed by our web servers.
Individual	For the purpose of this policy, 'individual' relates to prospective employees, contractors, clients and visitors to the website of YMCA Perth.
YMCA Perth	YMCA Perth includes entities: 1. YMCA Perth Inc. 2. YMCA Perth Youth & Community Services Inc.
YMCA Staff	Includes YMCA Staff, contractors or sub-contractors, labour hire employees, apprentices or trainees and volunteers involved with the activities of YMCA Perth. It also includes YMCA Perth Council of Governors, YMCA Perth Board Members and any person serving the YMCA Perth on a committee or advisory capacity.
YMCA Perth Website	www.ymcaperth.org.au