

Privacy Policy

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Introduction

The Victorian Deaf Society trading as Expression Australia (A.B.N.56 004 058 084) (we, us, our, or Expression Australia) recognises and values the protection of your personal information. We are fully committed to respecting the privacy of all interested parties involved with our organisation.

We have implemented this Privacy Policy in order to be open and transparent about

- how we collect, hold, and use your personal information
- under what circumstances we may disclose or transfer your personal information
- your rights to gain access to, and seek corrections of, your personal information we hold
- how you can approach us about your privacy-related concerns and complaints

Expression Australia is bound to act in accordance with the Australian Privacy Principles (Privacy Act 1988 Cth).

Collection of Personal Information

We may request personal information such as your name, title, contact details (address, phone, e-mail address). We only collect personal information when you knowingly provide it, for example:

- When you access services from any of our programs such as Audiology, Employment, Accommodation Services, etc.
- Where we require your personal information to maintain accurate records;
- If you participate in surveys and other types of research;
- If you subscribe to our mailing lists;
- When applying for a position at Expression Australia;
- During your employment at Expression Australia (where applicable); and
- Other situations where you would reasonably expect information to be collected.

However, under no circumstances will we request any information from you that may disclose your

- political, religious or philosophical opinions, beliefs, associations or affiliations;
- racial or ethnic origin (unless for data collection or funding requirements);
- membership of a trade union, or a professional or trade association; or
- criminal records

When you provide us with your personal information, you are consenting to our storage, use and disclosure of that information as outlined in this Privacy Policy.

Capture and Use of Personal Images

Expression Australia will provide public notice if cameras and/or video equipment will be in use during public events or services. It is the responsibility of the individual to notify us if you do not wish your personal image to be used for promotional purposes. Please contact our Quality Team (feedback@expression.com.au) if you have concerns regarding the use of your personal image.

Accuracy and quality of personal information

We will take all such steps as are reasonable in the circumstances to ensure that:

- all information collected from you is kept accurate, up to date and complete; and
- the personal information that we use or disclose is, having regard to the purpose of the use or disclosure, accurate, up-to-date, complete and relevant

Your option not to provide your personal information

Providing us with your personal information is absolutely optional, but may be necessary for us to provide you with our services. Whenever it is optional for you to provide us with non-essential personal information, we will make this clear to you. You also have the right to remain anonymous or use a pseudonym (fake name) in your interactions with Expression Australia

We may from time to time offer additional benefits to you and we may ask you to provide us with your personal details for these purposes. Providing us with this information is absolutely optional to you. However, if you do not provide your personal information to us we may not be able to contact you or give you access to the additional benefits.

You may opt out of these additional communications at any time. Please contact our Quality Team at feedback@expression.com.au if you wish to do so.

Use of the Website

We recognise that you have an interest in our collection and use of your personal information via our website: www.expression.com.au (herein referred to as 'the Website').

Collection of IP addresses

It is necessary to collect your IP address for your interaction with various parts of the Website. Your IP address is the identifier for your computer when you are using the internet.

We store your IP address for security and audit purposes. Your IP address will not be used by us or intentionally released to any third party.

Cookies

Most commercial websites use 'cookies', which are pieces of information that websites send to the browser and are stored in the computer hard drive. Cookies make using the Website easier by storing information about your preferences on the Website. This allows the Website to be tailored to you for any of your return visits. Cookies will not identify you personally.

If you would prefer not to receive cookies, you can alter your security settings on your web browser to disable cookies or to warn you when cookies are being used. However, by disabling the cookie function in your web browser you may impede your ability to use parts of the Website.

Disclaimer

Please note that security of information transmitted over the Internet cannot be completely guaranteed. However, we will endeavour to protect your personal information as best as possible but we cannot guarantee the security of any information that you transmit to us, or receive from us. The transmission and exchange of information is carried out at the user's own risk.

See also **Terms and Conditions** regarding use of the Website.

Use and Disclosure of your personal information

We hold your personal information for the following primary purposes:

- 1. to ensure the proper functioning of the Expression Australia organisation and its services
- 2. to assist Expression Australia with our auditing, marketing, planning, billing, product development and research requirements

We will not use or disclose (or permit the use or disclosure of) information that could be used to identify you in any circumstances except:

- to ensure the proper functioning of our organisation;
- to communicate additional benefits and special events to you;

- where the law requires us, or authorises us, or a company holding data on our behalf, to do so; or
- where you have given express consent to us for a prescribed purpose

We will not sell, distribute, rent, licence, disclose, share or pass your personal information onto any third parties, other than those who are contracted to us to keep the information confidential whether subject to a statute or a scheme which imposes similar restrictions to the Australian Privacy Principles contained in the Privacy Act 1988 (Cth), as amended, regarding the handling of personal information.

Should a third party approach us with a demand to access your personal information, we will take reasonable steps to redirect the third party to request the information directly from you, wherever it is lawful and reasonable for us to do so. Depending on your service area, third party information may or may not be accessible to service users and may need to be obtained from the third party directly.

If we are compelled to disclose your personal information to a third party we will take reasonable steps to notify you of this in advance, wherever it is lawful and reasonable for us to do so.

Security

We are committed to keeping your personal information secure regardless of the format in which we hold it and we take all reasonable steps to protect your information from misuse, interference, loss, and unauthorised access, modification or disclosure. For details regarding our Website security, please refer to 'Use of the Website' within this document.

Expression Australia has systems in place to respond to any loss of personal information that may occur. Contact our Quality Team at feedback@expression.com.au to find out more.

Access to your personal information

In most cases, you have the right to access the personal information that we hold about you. If you wish to access your personal information, please contact our Quality Team at feedback@expression.com.au

We will deal with all requests for access to personal information as quickly as possible. Requests for a large amount of information, or information which is not currently in use, may require further time before a response can be given.

We may charge you a reasonable fee for access if a cost is incurred by us in order to retrieve your information, but in no case will we charge you a fee for your application for access.

Whenever a fee will be applied, you will be notified of how that fee will be calculated, or where possible, the total amount that will be charged. You will then have the option to decide whether to proceed with your access request.

In some cases, we will refuse to give you access to personal information we hold about you. This includes, but is not limited to:

- circumstances where denying access is required or authorised by or under an Australian law or a court/tribunal order or where giving you access would be unlawful;
- have an unreasonable impact on other people's privacy;
- prejudice an investigation of unlawful activity;
- reveal our intentions in relation to negotiations with you so as to prejudice those negotiations;
- prejudice enforcement related activities conducted by, or on behalf of, an enforcement body;
- reveal evaluative information generated within the Expression Australia organisation in connection with a commercially sensitive decision-making process

We will also refuse access where the personal information relates to existing or anticipated legal proceedings, and the information would not be accessible by the process of discovery in those proceedings.

Further, we will refuse access where your request is frivolous or vexatious, and where we reasonably believe that: giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety; unlawful activity, or misconduct of a serious nature, is being or may be engaged in against Expression Australia and giving access would be likely to prejudice the taking of appropriate action in relation to that matter.

If we refuse to give you access we will provide you with reasons for our refusal, unless doing so would be unreasonable in the circumstances. We will also take reasonable steps to give you access in a way that meets your needs without giving rise to the reasons of our refusal. Further, we will provide details of how you may make a complaint about our decision.

These mechanisms for accessing your personal information operate alongside, and do not replace, other informal or legal procedures by which you may be provided with access to your personal information.

Correction of your personal information

The accuracy of the personal information we have requested from you is important to us. Should you suspect, or become aware of, your personal information that we hold is inaccurate, out of date, incomplete or misleading, please contact our Quality Team.

We will deal with all requests for correction of personal information as quickly as possible. Requests relating to a large amount of information, or information which is not currently in use, may require further time before a response can be given.

If we refuse to change the personal information as you request, we will provide you with reasons for our refusal, unless doing so would be unreasonable in the circumstances. We will also provide details of how you may make a complaint about our decision. Further, in case of our refusal, you may request that we take reasonable steps to associate, with the relevant information, a statement that you view it as inaccurate, out of date, incomplete or misleading.

In the case we have corrected personal information about you, you may request that we take reasonable steps to give notice of the correction to any third party to which we have disclosed the inaccurate, out of date, incomplete or misleading personal information.

These mechanisms for correcting your personal information operate alongside, and do not replace, other informal or legal procedures by which you may be provided correction of your personal information.

Overseas transfer of personal information

We may transfer your personal information to overseas recipients. However, we will seek your consent prior to disclosing your information if the overseas recipient is not regulated in a way that equally reflects the Australian Privacy Principles. We will take reasonable steps to ensure an overseas recipient does not breach the requirements of the Privacy Act 1988 (Cth).

Concerns and complaints about breaches

If you have concerns about how we handle your personal information, it is important that you notify us as soon as possible, so that we can address your concerns appropriately as the circumstances require. Any concern or complaint should be made in writing to our Quality Team (see contact details below). Alternatively you may contact the Office of the Australian Information Commissioner (OAIC) with your concern. Information about lodging a complaint is available on the OAIC's website (see in particular: http://www.oaic.gov.au/privacy/privacy-complaints).

If you are deaf, or hard of hearing or have a speech impairment, contact the Office of the Australian Information Commissioner through the National Relay Service:

- Teletypewriter (TTY) users phone 133 677 then ask for 1300 363 992.
- Speak and Listen users phone 1300 555 727 then ask for 1300 363 992.

Disposal of personal information not required

If we hold personal information about you, and we do not need that information for any purpose for which the information may be used or disclosed, we will take reasonable steps to destroy or de-identify that information unless we are prevented from doing so by law.

Amendments of this Privacy Policy

We are obligated to regularly review and update this Privacy Policy. We therefore reserve the right to amend this Privacy Policy at any time. Should any significant amendments occur, notification will be provided by publication on the Website 14 days prior to the changes being implemented (the Notice Period) unless the circumstances of the amendments makes it unreasonable to provide such a Notice Period.

Contacting us

If you have any questions, concerns or ideas about how we could improve our Privacy Policy, please contact our Quality Team at the details below. Where you provide suggestions, materials or feedback it is considered non-confidential and we may, at our complete discretion, use it to improve the Website, service and/or how we handle personal information without any obligation to compensate you regardless of how we use, implement, copy, modify, display, distribute and/or otherwise benefit from your suggestions, materials or feedback.

Contact details for the Quality Team

By post:

To the Quality Team Level 4, 340 Albert Street East Melbourne, Victoria 3002

Phone: +61 3 9473 1111 SMS: 0402 217 586

Email: <u>feedback@expression.com.au</u>

Skype: expression.australia Fax: +61 3 9473 1122 TTY: +61 3 9473 1199

For further information about privacy in general, please refer to the Office of the Australian Information Commissioner's website: http://www.oaic.gov.au