



Privacy Policy

Policy Number: 03/2023

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1. Purpose and context

ACT Pet Crisis Support (APCS) cares about protecting the privacy of all people who deal with us. This includes people seeking support from us, our clients, donors, supporters, and our volunteers.

This Privacy Policy describes how APCS collects, holds, uses and discloses personal information in accordance with the [Privacy Act 1988](#) (Cth) (the Act) and the [Australian Privacy Principles \(APPs\)](#). It also outlines your rights concerning how APCS handles your personal information including how you may access it, request correction or make a complaint.

By providing your personal information to APCS you consent to the collection, use, storage and disclosure of that information as described in this Privacy Policy and consistent with the Act.

2. Scope

This Policy applies to all people engaged in the collection or handling of personal information on behalf of APCS. This includes Office bearers, Committee members, sub-committee members and general volunteers.

3. Definitions

Personal information means information or an opinion about an identified person, or a person who is reasonably identifiable. This is whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not.

Personal information can range from sensitive and confidential information to information that is publicly available. A person's name, signature, home address, email address, telephone number, date of birth, medical records, bank account details and employment details will generally be personal information. Photos and videos of a person are treated as personal information under the Act if their identity is clear or could reasonably be worked out.

Sensitive Information means personal information about a person's racial or ethnic origin, political opinions or membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional association, trade association or trade union, sexual orientation or practices, or criminal record. A person's health information is also sensitive information.

Australian Privacy Principles (APPs) include 13 principles that govern the standards, rights and obligations related to privacy, and how personal information must be managed by any organisation or agency the Act covers.

4. The kinds of personal information APCS may collect and hold

APCS may collect personal information that is needed to carry out our functions and activities. The personal information collected may include, but is not limited to, your:

- name,
- contact details (telephone numbers, and home, postal and email addresses),
- date of birth,
- Centrelink identifier number and/or VetPay reference number,
- pension or Centrelink information,
- bank and credit card details,
- image/photograph (with their consent),
- potentially identifying information contained in their pet's Patient History,
- potentially identifying financial information, and
- other information they provide to APCS through our website or online presence.

5. How and when APCS collects and holds personal information

At all times we try to only collect the information we need for the particular function or activity we are carrying out. The main way we collect personal information about you is when you give it to us. For example, we may collect personal information:

- directly from you either in person, over the telephone, by email or via the use of the Contact Form on our website,
- from third-parties when you have authorised us to do so and/or authorised the third-party to provide the information to us, or
- through our website when you use the forms available.

5.1. Our website

APCS uses SupporterHub to process fundraising transactions such as raffle ticket sales and donations made using our website. The platform uses fully encrypted payment processing solutions. Personal information is stored in a secure, cloud-based Customer Relationship Management system. It provides fully assisted data transfer to a secure APCS database for receipting, communication and donor management processes. SupporterHub uses a direct banking integration and doesn't store credit card information but enables APCS to update card details as requested by donors.

APCS also uses Stripe, a payment processing platform that provides security measures to protect your card details during an online transaction. We do not collect your card details. When you buy items from the APCS online store using PayPal your personal details are collected and used by PayPal in accordance with the PayPal Privacy Statement.

We do not collect or store banking, debit or credit card details, or use them for any purpose other than to enable the donations or other financial transactions for which you have supplied the details.

When you visit or use our website APCS may collect information about your site visit and what you access or view while online. APCS's website may sometimes use Google services, such as Google Analytics, and may also use Mailchimp and SurveyMonkey. We use these services to understand more about traffic on our website and to manage, improve and secure our website. In some cases, these third-party providers may use cookies on our website in connection with online services like website analytics and surveys. They may collect information about your use of our website, including your computer's IP address, which they may store overseas. This technology allows them to deliver customised advertising content, measure the effectiveness of their advertising, evaluate users' use of our website and other websites and provide services relating to website activity and internet usage. Those third-parties may also transfer the information they collect to others where required to do so by law, or where those others process the information on their behalf. You can find more details in the privacy policies for those third-parties, including information on how to opt out of certain conduct.

5.2. Other websites, platforms and third-parties

When donations are made to APCS via My Giving Circle or PayPal account we do not collect or store banking, debit or credit card details.

The APCS website may contain links to other websites that aren't covered by this Privacy Policy. This includes social media sites such as Facebook and Instagram. If you access these other sites using the links provided, the operators of those sites may collect information from you which they will use in accordance with their privacy policy. We encourage you to examine each website's privacy policy and use your own judgement about the accuracy, reliability and correctness of the information provided.

When you "like" or "follow" APCS on Facebook, Instagram or other social media sites APCS may collect information from you including your name, email address, and any content posted by you relevant to APCS.

APCS sometimes uses third-party providers to deliver web-based services and to communicate digitally. We may use platforms to sell tickets to fundraising events or to manage event registration. These providers may collect personal information including your email and IP addresses. People using these platforms are encouraged to review the privacy policies of the providers to determine how they collect and handle personal information.

APCS may also collect personal information directly from publicly available sources or from other third-parties. Third-parties such as vet clinics may provide APCS with your personal information when you have requested them to do so.

5.3. Unsolicited personal information

When APCS receives unsolicited personal information, we will assess whether it is personal information that we could legally collect. If it is, we will handle it according to the APPs. If it is not, and it is lawful to do so, we will destroy or de-identify it as soon as possible.

5.4. Notification of collection of personal information

When APCS collects your personal information, we will advise you why we are collecting the information and how we will use it. We will also tell you the outcome for you if the information is not collected. When we collect personal information from a third-party, we will take reasonable steps to let you know the circumstances of the collection. This Privacy Policy should be read together with our Notice of Collection and any specific privacy notices provided to you when we collect your personal information.

5.5. How APCS holds personal information

We may hold personal information in digital or hard copy form as is necessary to carry out our functions and activities. We take all reasonable steps to protect the information held against loss, unauthorised access, modification, disclosure or misuse.

We use a range of measures to protect the security of your personal information. Those measures include physical security of hard copy records, restrictions on digital access, and network firewalls to protect digital records. Only authorised people with a 'need to know' have access to the personal information we hold.

It is not possible, however, for data security measures to guarantee 100% security of digital records. No network, server, database, or internet or email transmission is ever fully secure. Information transmitted over the Internet is not secured by us and is vulnerable to attack or interception.

5.6. Quality of personal information

APCS takes reasonable steps to ensure that personal information collected, stored, used and disclosed is accurate, complete and up-to-date. To ensure this we:

- aim to record information in a consistent format,
- where necessary and/or possible, confirm the accuracy of information collected from a third-party or a public source,
- add updated or new personal information to existing records when collected, and
- review the quality of personal information before it is used or disclosed.

6. Why APCS collects, holds, uses and discloses personal information

6.1. Collection and use of personal information

We may collect, hold, use and disclose personal information for purposes necessary to effectively carry out our activities and functions to provide our services. These purposes include:

- **Service provision** – to provide services requested by you. This may include considering or processing applications for financial assistance, palliative care or coordination of referrals, or to provide vet care via our Tiny Vet Clinic,
- **Identity confirmation** - to enable us to establish your identity and/or confirm information you have provided about yourself or your pet, where it is necessary for our purposes or a permitted general situation exists as described by the APPs. Sometimes we will need to collect and hold the identifying information. At other times

we may only need to 'sight' an identity document or other information and record the type of document and its details.

You may need to identify yourself before we can provide certain information or services to you. There is no obligation for you to provide us with any of your personal information. If, however, you choose not to, or choose to remain anonymous or use a pseudonym (made up name) we may not be able to provide you with the services you require.

You may also have the option to not identify yourself or to use a pseudonym (a made-up name) when dealing with us for certain matters, unless we believe it is not possible in the circumstances. If you wish to deal with us in this way, you must tell us in writing so we can consider if your request is practicable.

- **Communication** - to communicate with you, including to respond to enquiries or handle complaints. We also need to keep your records and contact details up-to-date in order to maintain our relationship with you. We may communicate with you in a variety of ways including by postal mail, email, telephone, and/or text message, or via a third-party dealing directly with us on your behalf as agreed by you.
- **Administration** - for administrative purposes including to maintain our client records. This assists us to effectively manage our services and enables us to meet our record-keeping obligations under laws including the *Australian Charities and Not-for-profits Commission Act 2012* (Cth). Your personal information is also used to administer financial donations, account for activities or expenses, in relation to your involvement in our events, mailing lists, or Volunteer Program, and for reporting purposes including to government agencies.
- **Volunteer coordination and management** - to process applications to join our Volunteer Program, to administer the Program, and to maintain contact with past, present and potential volunteers.
- **Fundraising** - to run fundraising and charitable activities and events in support of our objectives, for example when you register to attend an event or enter a competition.
- **Direct Marketing** - for direct marketing and promotional purposes with your consent or when authorized by law. You may be contacted if you have subscribed to our mailing list, have used our charity previously, have made a donation or have provided details as part of our fundraising activities. We may use your email address to provide newsletters or to inform you about APCS services, fundraising activities and events we think might interest you. You can request to 'opt-out' of receiving these communications. We aim to action opt-out requests within 30 days,
- **To protect us and others** - where we believe it is necessary to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to people's safety, or violations of this Privacy Policy.
- **Legal compliance** - to comply with regulations, government requirements, and where necessary to comply with law or court/tribunal orders.

APCS limits the collection, storage, use and disclosure of *sensitive* information to where the information is:

- directly relevant to the purpose for collection,

- reasonably necessary to carry out our functions or activities, or
- required by law.

7. How we may disclose your personal information

We do not use or disclose personal information for any purposes other than that for which it was collected (the primary purpose) unless:

- you have consented to a secondary use or disclosure, or
- the secondary use or disclosure is related to the primary purpose (in the case of personal information) or is directly related to the primary purpose (in the case of sensitive information), or
- required or authorised by law/a court/tribunal order, or where another permitted exception under the Act applies.

We may disclose your information to third-parties only when the disclosure relates to the services we provide to you and we have your consent or request to do so. APCS will not use or disclose your personal information for a related secondary purpose without your consent unless you would reasonably expect us to do so. When we disclose personal information to third-parties we will take reasonable steps to ensure appropriate safeguards are in place and that the third-party provider does not breach the APPs.

APCS will not buy, rent, sell, share or disclose personal information other than as described in this Privacy Policy.

7.1. Disclosure to overseas recipients

APCS will not disclose your information to overseas recipients. Information may however be processed, used, and stored digitally on our behalf by contractors engaged to provide us with services. Such services include data storage in offshore clouds or servers. These arrangements are not considered a disclosure but a use of personal information.

8. Retention of personal information and destruction of information that does not need to be retained

We will retain your personal information for as long as we have a reasonable legal or operational need for it. When we no longer need to retain information, and we are lawfully able to do so, we will destroy or de-identify that information.

9. How you may access your personal information and seek its correction

You are entitled to request access to the personal information we hold about you. This is generally provided upon request subject to confirming your identity. In limited situations there may be a reason why we won't act on a request, such as where it would have an unreasonable impact on the privacy of others or we may not be permitted to do so by law. If we refuse to provide access, we will advise you in writing of the reasons and how a complaint may be made about it.

You may also request corrections to the information we hold about you. When you inform us that information is inaccurate, out-of-date, incomplete, irrelevant or misleading, we will

correct it when we agree with you. We may refuse your request if we believe an applicable law prevents the correction, or if we don't agree that the information is incorrect, out-of-date, incomplete, irrelevant, or misleading. In these instances we won't amend the information but will advise you accordingly and include a note with the information that you consider it should be amended.

Notifying us when your personal details change or when you realise that information we are holding about you is incorrect will help us to ensure the information we hold is as accurate as possible.

To help us deal with requests for access or correction we ask that you email requests to actpetcrisis@gmail.com, with the following identifying information included:

- your name and contact details,
- the personal information you want to access,
- how you'd like access the information (such as receiving a copy by email or post, or if you just want to look at the information), and
- if you authorise another person to access the information on your behalf.

10. How to contact us regarding this Privacy Policy, or to make a privacy complaint about a breach of the APPs by APCS

If you have queries or concerns about the way we handle your personal information, please contact us. We will work to resolve the issue as quickly as possible. We will treat your enquiry or complaint confidentially; however we may request additional details from you regarding your concerns and may need to consult with other parties in order to investigate and deal with the matter.

Contact: ACT Pet Crisis Support Inc. Committee Secretary

Email: secretary@actpetcrisis.com

Web: via our Contact Form at: <https://www.actpetcrisis.com/contact-us.html#/>

Address: PO Box 3362, Belconnen Dc, ACT, 2617

Queries or complaints should include your name, address, phone number and enough information about the privacy-related issue to enable us to take action. We will promptly acknowledge complaints and undertake an investigation, and will endeavour to keep you updated regularly throughout the investigation.

If you are unsatisfied with our response, you can make a complaint to the Office of the Australian Information Commissioner (OAIC) via their website at <https://www.oaic.gov.au/>, by email to enquiries@oaic.gov.au, or by calling 1300 363 992.

11. How APCS will manage an actual or suspected privacy data breach under this Privacy Policy

We take your privacy seriously and will deal promptly with any suspected or actual unauthorised access, use or disclosure of your personal information in accordance with our Data Breach Response Plan.

In general, the Notifiable Data Breaches (NDB) scheme under the Act requires organisations covered by the Act to notify people whose personal information is involved in a data breach. It also requires them to notify the OAIC where the breach is likely to result in serious harm to those people. Due to APCS's organisation type, scale and our activities we are not required to notify the OAIC under the NDBS. It is our policy however that the APCS Committee consider whether to voluntarily report any significant privacy data breach and to seek the OAIC's advice when we consider a breach may result in serious harm to affected people. This is in keeping with best privacy practice.

12. APCS Roles and responsibilities under this Policy

- the President is responsible for overseeing the regular review of this Policy,
- the Committee is responsible for:
 - ensuring APCS complies with all relevant laws governing the collection, storage and use of people's information and data,
 - ensuring a privacy-by-design approach when considering new processes and procedures,
 - communicating a commitment to this Privacy Policy and modelling appropriate behaviours,
 - ensuring that decisions regarding volunteers and the work environment comply with this Policy,
 - reviewing and amending this Policy as required, and
 - addressing suspected or actual data breaches in accordance with the APCS Data Breach Response Plan,
- the Committee Secretary is responsible for receipting, acknowledging and taking immediate action to refer privacy enquiries and complaints for action, and
- all volunteers are responsible for:
 - being aware of this Privacy Policy and understanding their obligations and rights in dealing with personal information, and
 - complying with their responsibilities under this Privacy Policy, and
 - following any procedures or advice provided if their role involves the collection or use of personal information on behalf of APCS.

13. Revision

APCS may, from time to time, review and update this Privacy Policy to take into account new laws and technology, and changes to the charity's operations, practices and management of privacy-related matters.

Document Control

Policy owner: Policies & Procedures Subcommittee

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Next review Date: 01/07/2024