



# POLICY

---

# Privacy

Policy Review Date

June 2021

Policy Version

3.0

DOCUMENT UNCONTROLLED WHEN PRINTED

## PURPOSE

The purpose of the privacy policy is to inform you about the personal information handling practices of JCS.

## SCOPE

This policy applies to all personnel, which includes:

- JCS Board of Management;
- JCS Employees and Volunteers;
- Contractors engaged by JCS; and
- Consultants engaged by JCS;

It is the responsibility of every person in scope to ensure he or she complies with this policy. Where a person is unsure of his or her obligations under this policy, the General Manager should be contacted for clarification of any issues.

## DEFINITIONS

**JCS** Jewish Community Services Inc.

**Anonymity** is where an individual is not required to and does not identify him or herself when engaging with JCS.

**Consent** is a voluntary and informed agreement by an individual to something JCS does. Where JCS considers that a person is unable to give this consent to the use of his or her personal information for a particular purpose, JCS will ask that person's parent or guardian to provide the consent.

**Health Records** are part of personal information and sensitive information, and include information or an opinion about a person's health or disability. In the case of JCS, most health records that are subject to the Law are collected for the purpose of assessing and placing staff and volunteers with a client and for the provision of services, programs and activities.

**Personal Information** means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- whether the information or opinion is true or not; and

- whether the information or opinion is recorded in a material form or not.

The types of personal information we collect may include your name, date of birth, gender, contact information, credit/debit card information, health & medical information, emergency contact details and other information about your history with, or relationship to a client of JCS.

**Sensitive Information** is part of personal information and includes information JCS may collect such as racial or ethnic origin, religious beliefs, membership of a professional or trade association, criminal record, or health information.

**Solicited Information** is personal information that JCS takes active steps to collect.

**Unsolicited Information** is personal information about an individual that JCS has not asked for but receives in some other way. An example is where misdirected mail is received by JCS.

## POLICY

Jewish Community Services Inc (ABN 29044039946 ) (“JCS” “we”, “us” and “our”) respects every individual’s legal right to privacy. This policy sets out our procedures relating to the collection, holding, use and disclosure by JCS of personal information and sensitive information relating to an individual, as required by the [Privacy Amendment \(Enhancing Privacy Protection\) Act 2012 \(Cth\)](#) and we will endeavour to handle your personal information in accordance with our Privacy Policy and the [Australian Privacy Principles \(APPs\)](#).

Our Privacy Policy summarises how we handle your personal information. We may revise this Privacy Policy from time to time by updating this page. The revised Privacy Policy will take effect when it is posted on our website [www.icssa.asn.au](http://www.icssa.asn.au)

Our obligations are set out in full in the Australian Privacy Principles contained in the Act. You can find these on the Office of the Australian Information Commissioner’s website at [www.oaic.gov.au](http://www.oaic.gov.au)

## GUIDELINES

### Whose Personal Information do we collect?

We collect personal information from people who are connected to JCS operations and activities – including clients, recipients of support services, community members, employees, donors, health professionals, volunteers, service providers and agencies, consultants and contractors.

### How do we collect your Personal Information?

Where possible, we will collect your personal information directly from you. This may be in person (for example, where you request access to JCS services or attend an event), on the telephone (for example, if you contact the Home & Community Support Team, or online (for example, if you sign up or subscribe to publications, e-News and other events on our website).

We also obtain personal information from third parties such as brokered agencies and contractors (who deliver services on our behalf), vendors (including our accounting contractor) health professionals, social and community workers. If we collect personal information about you from a third party and it is unclear that you have consented to the disclosure of your personal information to us, we will take reasonable steps to contact you and ensure that you are aware of the circumstances surrounding the collection and purposes for which we collected your personal information.

### **Why do we collect your Personal Information?**

We may collect your personal information for a number of purposes, including:

- **Health & Wellbeing:** to understand your individual health requirements to deliver person centred services that are tailored to your needs
- **Safety & Security:** to respond in an emergency when there is no response to a planned service or visit
- **Support services:** to provide you with information and support services, and to evaluate and report on these services
- **Health promotion:** to provide you with information about a range of health and awareness campaigns
- **Marketing:** to communicate with you about donations, products, services, campaigns, causes and events
- **Volunteering and other support:** to enable you to assist us with volunteering, community fundraising, advocacy and other activities where we seek the community's assistance
- **Other issues:** communicating with you in relation to our operations, activities and objectives, to verify your identity, to improve and evaluate our programs and services and to comply with relevant laws.

Where we collect your personal information for a specific purpose not outlined above, we will provide you with a collection notice which explains the primary purpose and any related secondary purposes for which we are collecting your personal information.

### **Health Information and other Sensitive Information**

As part of administering our services, we may collect health information and other sensitive information. For example, we may collect medical history information from you, if you are requesting access to our services and programs. Sensitive information includes the following type of information: racial or ethnic origin; religious beliefs or associations; philosophical beliefs; memberships; sexual orientation; and life events. We will limit the collection of sensitive information to the minimum amount required to deliver our services and programs.

### **What happens if you don't provide all this Information?**

If you do not provide some or all of the personal information requested, we may not be able to offer you services or provide you with information about our causes, events, programs and projects.

## **Using a pseudonym or engaging with us anonymously**

Where practicable, you will be given the opportunity to engage with JCS on an anonymous basis, or using a pseudonym.

## **Website usage information and cookies**

When you access our website, we may use software embedded in our website (such as Javascript) and we may place small data files (or cookies) on your computer or other device to collect information about which pages you view and how you reach them, what you do when you visit a page, the length of time you remain on the page, and how we perform in providing content to you. A cookie does not identify individuals personally, but it does identify computers. You can set your browser to notify you when you receive a cookie and this will provide you with an opportunity to either accept or reject it in each instance.

We may gather your IP address as part of our business activities and to assist with any operational difficulties or support issues with our services. This information does not identify you personally.

## **Opting out of direct marketing communications**

Where we use your personal information to send you program & event information, marketing and promotional information by post, email or telephone, we will provide you with an opportunity to opt-out of receiving such information. By electing not to opt-out, we will assume we have your implied consent to receive similar information and communications in the future. We will always ensure that our opt-out notices are clear and easy to identify.

If you do not wish to receive event information or direct marketing communications from us, please contact us at JCS, 227 Payneham Road, Joslin, SA, 5070 or 08 8363 5400 or email [privacy@jcssa.asn.au](mailto:privacy@jcssa.asn.au).

## **Who does JCS disclose your personal information to?**

We may need to disclose your personal information to others in order to carry out our services, programs, activities and day to day business. This may include:

- External support services: to health care professionals, accountants, lawyers, other professionals, counsellors, funding bodies, financiers, co-ordinators, volunteers, service providers, Government agencies and other not-for-profits that provide support services.
- Contractors and service providers who perform services on our behalf, such as mailing houses, printers, information technology services providers (including offshore cloud computing service providers), database contractors and telemarketing agencies.

Wherever we propose to disclose your personal information to a third party not outlined above, we will provide you with a collection notice which explains the circumstances in which we might disclose your personal information.

## **Where is your personal information stored?**

We take all reasonable steps to protect all of the personal information we hold from misuse, interference and loss, and from unauthorised access, modification or disclosure. Your personal information will be stored on a password protected electronic database, which may be on our

maintained server system, a database maintained by a cloud hosting service provider or other third party database storage or server provider. Backups of electronic information are written to drives which are stored offsite.

Hard copy information is also stored in our office, which are secured to prevent entry by unauthorised people. Any personal information not actively being used is archived, usually for 7 years.

Where personal information is required to be stored with a third party and offsite from our premises, we will put into place arrangements which require those third parties to maintain the security of the information. We will take all reasonable steps to protect the privacy and security of that information, but we are not liable for any unauthorised access or use of that information. Your personal information will stay on the database indefinitely until you advise you would like it removed, unless we de-identify it or destroy it earlier in accordance with privacy law requirements.

### **Your direct debit or credit cards**

We use third party Secure Socket Layer (SSL) certificates which is the industry standard for encrypting your credit card and debit card numbers, your name and address so that it cannot be viewed by any third party over the internet.

### **Access to your personal information**

We will, upon your request, and subject to applicable privacy laws, provide you with access to your personal information that is held by us. However, we request that you identify, as clearly as possible, the type(s) of information requested. We will deal with your request to provide access to your personal information within 30 days and you agree we may charge you our reasonable costs incurred in supplying you with access to this information.

Your rights to access personal information are not absolute and privacy laws dictate that we are not required to grant access in certain circumstances such as where:

- access would pose a serious threat to the life, safety or health of any individual or to public health or public safety
- access would have an unreasonable impact on the privacy of other individuals
- the request is frivolous or vexatious
- denying access is required or authorised by a law or a court or tribunal order
- access would be unlawful, or
- access may prejudice commercial negotiations, legal proceedings, enforcement activities or appropriate action being taken in respect of a suspected unlawful activity or serious misconduct.

If we refuse to grant you access to your personal information, we will provide you with reasons for that decision (unless it is unreasonable to do so) and the avenues available for you to complain about the refusal.

### **Updating your personal information**

You may ask us to update, correct or delete the personal information we hold about you at any time. We will take reasonable steps to verify your identity before granting access or making any corrections to or deletion of your information. We also have obligations to take reasonable steps to correct personal information we hold when we are satisfied that it is inaccurate, out- of-date, incomplete, irrelevant or misleading for the purpose for which it is held.

If you require access to, or wish to update your personal information, please contact us at JCS, 227 Payneham Road, Joslin, SA, 5070 or 08 8363 5400 or email [privacy@jcssa.asn.au](mailto:privacy@jcssa.asn.au)

### **Complaints**

If you have any queries or if would like to make a complaint regarding your Privacy or the manner in which we handle your personal information, please contact the General Manager, on 08 8363 5400 or email [privacy@jcssa.asn.au](mailto:privacy@jcssa.asn.au) . We endeavour to respond to complaints and queries within 48-72 hours of receipt.

If you are dissatisfied with our response, you may refer the matter to the Office of Australian Information Commissioner by visiting [www.oaic.gov.au](http://www.oaic.gov.au)

If you do not provide some or all of the personal information requested, we may not be able to offer you services or provide you with information about our causes, events, programs and projects.

### **Review**

This Privacy Policy will be reviewed annually, when there are any changes to the Law, and updated as required.

## **RELATED DOCUMENTS & ATTACHMENTS**

### **Related Legislation/Acts**

- [Australian Privacy Principles](#)
- [Privacy Amendment \(Enhancing Privacy Protection\) Act 2012 \(Cth\)](#)
- [The Privacy Act 1988 \(Privacy Act\)](#)

### **Related JCS Policies/Documents/Forms**

- Protecting your Privacy Brochure

### **Related Aged Care Quality & Safety Standards**

- 1. (3) f Consumer Dignity and Choice (Privacy and confidentiality)
- 8 (3) c.v Organisational Governance (Regulatory compliance)
- 8 (3) d Organisational Governance (Effective risk management systems)
- 8 (3) c.i Organisational Governance (Information provision)