



Lifeline Australia Limited Privacy Policy

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Lifeline Australia Privacy Policy

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1. About this Policy

(Version 2.0, April 2018)

The [Privacy Act 1988](#) requires entities bound by the Australian Privacy Principles to have a privacy policy. This privacy policy outlines the personal information handling practices of Lifeline Australia Limited ACN 081 031 263 (Lifeline Australia).

Lifeline Australia employees and prospective employees who have been offered a position should also refer to our Employment Conditions Policy.

This policy is written in simple language. The specific legal obligations Lifeline Australia has when collecting and handling your personal information are outlined in the *Privacy Act 1988* (Cth), and in particular the Australian Privacy Principles found in that Act.

We will update this privacy policy when our information handling practices change. Updates will be published on our website.

2. Scope of this Policy

This policy applies to Lifeline Australia's handling of personal information.

In this Privacy Policy, 'personal information' has the same meaning as defined under section 6 of the Privacy Act 1988:

personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

(a) whether the information or opinion is true or not; and

(b) whether the information or opinion is recorded in a material form or not.

This policy also refers to 'sensitive information', which is a subset of personal information. Sensitive information includes information or an opinion about your:

- racial or ethnic origin;
- political opinions;
- religious beliefs or affiliations;
- philosophical beliefs;
- sexual orientation;
- criminal record;
- health information; or
- genetic information.

3. Anonymity

Where possible, we will allow you to interact with us anonymously or using a pseudonym. For example, if you seek to contact us through the Online Crisis Support Chat Service, the 13 11 14 telephone service, donating to Lifeline, the Text4Good service or our general enquiries and

feedback online form we will not ask for your name or seek identifying information unless we need it to adequately respond to your request or to assist you. However, please see below information collected via our IT systems when you contact Lifeline's 13 11 14, Online Crisis Support Chat or Text4Good services.

However, if we do identify you in the course of interacting with you anonymously (such as through your telephone number), we may use or disclose that information to protect you or others. For example we may provide your phone number to emergency services if we think there is a risk of harm to you or another person. This is described in more detail in paragraph 6.1.

The choice of how much information you provide to us is yours and depends on the purposes for which you interact with Lifeline Australia. However, if, for example, you want to subscribe to our mailing list, make a donation, apply to become a volunteer, or apply for employment with us, we require certain information from you. Our information handling practices in relation to the personal information we collect are explained below.

4. Overview of Lifeline Australia's use of personal information

We collect, hold, use and disclose personal information for the purpose of carrying out the objectives of Lifeline Australia. The objectives of Lifeline Australia (**Lifeline Australia Objectives**) are to:

- encourage, support and undertake the organisation, establishment, maintenance, development and operation of Lifeline Services and Lifeline Centres throughout Australia, where those services are provided by Affiliate Members, other Accredited bodies corporate or Lifeline Australia itself;
- grant Accreditation to Lifeline Centres so as to provide to all communities an accessible caring and counselling service, primarily (though not exclusively) through telephone counselling services to enable people to overcome isolation and cope with problems and crisis affecting mental health, well-being, life and safety;
- develop and conduct programs, projects and initiatives to enable people to overcome isolation and cope with problems and crisis affecting mental health, well-being, life and safety; and
- do any other things incidental or conducive to the furtherance of its objects.

Lifeline Australia leads a national network of organisations (**Lifeline Australia Members**) established to implement the Lifeline Australia Objectives, Australia-wide. The list of our Lifeline Australia Members can be found at <https://www.lifeline.org.au/about-lifeline/corporate-governance/member-organisations>.

The Lifeline Australia Members are separate legal entities to Lifeline Australia. This privacy policy applies to the activities (discussed in more detail below) undertaken by Lifeline Australia to carry out the Lifeline Australia Objectives. This privacy policy does *not* apply to Lifeline Australia Members also involved in the delivery of Lifeline services. Lifeline Australia Member organisations have their own privacy policies.

We use personal information to perform activities necessary to carry out the Lifeline Australia Objectives. These activities include:

- providing crisis support and suicide prevention services through Lifeline Australia's wholly owned subsidiary;

- providing administration and IT support to Lifeline Australia Members to enable them to provide crisis support and suicide prevention services (for example 13 11 14, Online Crisis Support Chat and Text4Good);
- conducting education and training in suicide prevention, crisis support and life management to Lifeline Crisis Supporters and external individuals and organisations;
- conducting research and evaluation and assurance activities to ensure the delivery of quality services and achieve continuous improvement in service delivery;
- conducting fundraising activities to raise funds to support the implementation of the Lifeline Australia Objectives;
- assessing suitable candidates for career opportunities within Lifeline Australia and managing your employment with us if you are an employee;
- assessing suitable candidates for volunteering opportunities within Lifeline Australia
- communicating with the public and the media, including through websites and social media, to raise public awareness of Lifeline services; and
- conducting investigations, and managing responses, in relation to complaints concerning Lifeline services and the operations of Lifeline Australia and its Members.

Use for primary purpose and certain secondary purposes.

Lifeline Australia must only use individuals' personal information for the primary purpose for which it was collected, a secondary purpose to which the individual has consented, or for a purpose related to the primary purpose of collection and the individual would reasonably expect the personal information to be used for such purpose.

Primary purposes (and secondary purposes for which consent is required) should be set out in collection notices, and may include:

- marketing: to communicate with individuals about donations, products, services, campaigns, causes and events.
- Research: to conduct and/or fund research into Lifeline Australia's programs and services or research into supporter attitudes.
- Volunteering and other support: to enable individuals to assist us with volunteering, community fundraising, advocacy or other activities where we seek the community's assistance.
- Other issues: communicating with individuals in relation to our operations, activities and objectives, to verify their identity, to improve and evaluate our programs and services and comply with relevant laws.

Use for direct marketing General principles

Lifeline Australia may use individuals' personal information for direct marketing purposes, but only where:

- The direct marketing communication contains a prominent statement that the individual may opt out of receiving that type of communication, and

- The relevant individual has not made such a request

Consent for direct marketing

Individuals whose personal information is collected using a collection notice that references this Privacy Policy are taken to consent to the use of their personal information for direct marketing purposes, unless they have specifically opted out.

Opting out of direct marketing

Email direct marketing communications should contain an 'unsubscribe' link that provides individuals with the opportunity to opt out of direct marketing communications. In other circumstances, individuals who do not wish to receive direct marketing communications from Lifeline Australia may contact us at (02) 6215 9400 or fundraising@lifeline.org.au to opt out or use the opt out provided on the direct marketing material.

Lifeline Australia must take all necessary steps to opt such individuals out of direct marketing communications. Requests to opt out of direct marketing communications should be treated in the first instance as a request to opt out of the particular campaign or event to which the communication relates. However, individuals must be given the opportunity to contact Lifeline Australia (for example, by phone) to opt out of all direct marketing communications, across all programs, events and channels.

Individuals who have opted out of direct marketing may still receive administrative emails or phone calls, such as reminders to bank funds raised.

Removal of opt-outs

Individuals who register for events, make a donation or otherwise provide their personal information for marketing-related purposes after they have previously opted out of direct marketing communications should be taken to have 'opted in' once again and may receive direct marketing communications. However, all such direct marketing communications must give the individual the opportunity to opt out as described above.

5. Collection and use of your personal information

5.1 What we collect

We try to only collect personal information that is reasonably necessary for, or directly related to, an activity we are undertaking to carry out a Lifeline Australia Objective. The kind of personal information we may collect, and its uses, are described below.

Information collected in providing a Lifeline crisis support service

We collect information that you provide to the Lifeline telephone crisis support service, or through contact with the Online Crisis Support Chat Service or the Text4Good service. We collect this information as a result of our role in providing:

- services directly to you through Lifeline Direct; or
- administration, IT support and infrastructure to Lifeline Australia Members.

For example:

- a Telephone Crisis Supporter will create a simple text-based electronic record of the caller's situation as told to the Telephone Crisis Supporter. The record will include the call time and duration; originating region of the call; telephone number (if unblocked);
- the IT infrastructure that supports the Online Crisis Support Chat Service will collect and retain the web-chat between you and the Online Crisis Supporter, your device's IP address, and whether emergency services were engaged.

Your name and contact details are not recorded in either of the above records unless you provide them to us.

Information collected when you make a general enquiry

We collect personal information that you provide to enable us to respond to your enquiry. For example, we collect your name and contact details and the nature of your enquiry if you contact us to:

- receive information from us or to become involved in our campaigns, fundraising or other initiatives (but only if we need these details to respond);
- make a complaint about the way a Lifeline service has been delivered to you;
- ask for access to information that Lifeline Australia holds about you;
- notify Lifeline Australia about a data breach;
- report a matter for investigation; and
- apply for a job vacancy at Lifeline Australia.

Information collected in relation to Fundraising

For the avoidance of doubt, fundraising refers to the activities undertaken by Lifeline to raise funds to support its Crisis Services. This includes (but is not limited to), facilitating donations, sponsorships, workplace giving and fundraising campaigns.

When you make a donation, we collect your name and contact details, your credit card number, the card expiry date and the amount donated. The only information that is required when you make a donation via our website is your credit card details.

Where possible, we will collect personal information directly from the individual. However, it is permissible to obtain personal information from third parties such as contractors (including fundraising service providers and list vendors). Lifeline Australia will ensure that any contractual arrangements with a list owner or broker will ensure that any contractual arrangements with a list owner or broker will meet all requirements outlined in the Australian Privacy Principles. Until first use, the broker or, in the case of the data being supplied direct, list owner is responsible for the accuracy and the agreement of those people on the list for their details to be used by third parties.

If personal information about an individual is collected from a third party and it is unclear that the individual has consented to the disclosure of his or her personal information to Lifeline Australia, reasonable steps should be taken to contact the individual and ensure that they are aware of the collection. In most cases, this can take place simultaneously with the first use of the information by Lifeline Australia.

Donors also have the availability to 'opt in' to providing other information such as date of birth, employment information, including but not limited to job title, opinions via surveys and questionnaires and postal address. This information can be provided to Lifeline in an 'opt in' basis, and donors have the ability to opt out of this at any time.

Collection notices

Where Lifeline Australia collects personal information from an individual in relation to fundraising, that individual should be provided with a collection notice.

Collection notices should generally be provided at the time the information is collected. Where this is not practical (for example, where information is collected from a third party), the collection notice should be provided at the time of first contact with the individual. The collection notice should cover as many of the following matters as is reasonably practicable in the circumstances:

- Lifeline Australia's name and contact details
- If the personal information was collected from a third-party source, how it was collected
- The purposes for which the information is being collected
- The consequences to the individual of not providing the information
- To whom Lifeline Australia usually discloses that kind of personal information
- Information about how to find or obtain our Privacy Policy, as well as information on access to and correction of personal information and how an individual may complain about a breach of the Australian Privacy Principles
- Whether we are likely to disclose personal information to overseas recipients, and if practicable, the countries where they are located.

Direct Marketing

Lifeline Australia may use individuals' personal information for direct marketing purposes, but only where:

- The direct marketing communication contains a prominent statement that the individual may opt out of receiving that type of communication, and
- The relevant individual has not made such a request.

Information collected when you purchase

When you order resources from the Lifeline Shop, we collect your name and contact details, items purchased, the last four digits of your credit card number and the card expiry date.

Information collected when you volunteer to deliver Lifeline services

We collect personal information necessary to enable us to assess your application to register as a volunteer. Depending on the role this may include your employment and volunteer history, education, criminal history or a working with children background check. Volunteers for Board member positions may also have to provide information relevant to assessing conflict of interest risks.

Information collected when you seek employment with Lifeline Australia

We collect personal information necessary to enable us to assess your application for employment with us such as:

- your résumé, statement addressing the criteria and referee reports;
- written tasks undertaken by you during the selection process;

- details of financial and other personal interests supplied by you for the purpose of managing potential conflicts of interest;
- proof of Australian citizenship or residency;
- copies of academic qualifications.

Information collected in relation to Lifeline Australia employees

We collect personal information necessary to manage our employees such as:

- the employee's employment contract;
- details of financial and other personal interests which may be relevant for the purpose of managing conflicts of interest;
- proof of Australian citizenship or residency;
- copies of academic qualifications;
- records relating to the employee's salary, benefits and leave;
- health related information supplied by an employee or their medical practitioner;
- taxation details;
- superannuation contributions; and
- information relating to the employee's training and development.

Information collected via the Workforce Management System

Lifeline Australia facilitates the use of a Workforce Management System (WFMS) by the Lifeline Australia Members for the purpose of forecasting call demand and the allocation of resources across the Lifeline network (to support 13 11 14, Crisis Chat and Text4Good). The WFMS holds details of each Crisis Supporter's name and contact details; skills and training, rostered shifts and employment status (employee or volunteer).

Information collected in the delivery of training and education services

We collect personal information such as student contact details, enrolment forms and academic records which are required by law to be collected by Lifeline Australia as a Registered Training Organisation (RTO).

As an RTO, Lifeline Australia is also required to collect information from trainers and assessors to verify they possess the requisite qualifications to deliver training and education.

5.2 Who we collect personal information from

The main way we collect personal information about you is when you give it to us or through a Lifeline Australia Member (service delivery provider).

For example, we may collect personal information from you:

- when you have contact with us over the telephone;
- when you have contact with us in person;

- when you interact with us online including via our website, Online Crisis Support Chat Service, Facebook and Twitter; and
- when you communicate with us in writing including via post.

We also collect personal information from you when you give it to a Lifeline Australia Member and that information is entered by that Member into IT systems that are provided and supported by Lifeline Australia.

Sometimes we collect personal information from a third party or a publicly available source, but only if the individual has consented to such collection or would reasonably expect us to collect their personal information in this way. For example, we collect personal information:

- from referees provided by you in support of an application for a Lifeline Australia position with us (either as an employee or as a contractor);
- from third parties such as contractors (including fundraising service providers) and list vendors;
- from other organisations that you have donated to, where you have consented to receiving information from like-minded organisations such as Lifeline Australia; and
- from academic and training organisations where required to verify a person's educational status.

We may also collect personal information about you from a third party in the course of a person calling a Lifeline service such as the Online Crisis Support Chat Service, the 13 11 14 telephone service or the Text4Good service. As we do not create records that identify people who use Lifeline services, personal information about you that is provided by another person in these circumstances, will not be contained in a record that is easily linked to you.

Minors

With specific reference to donations made to Lifeline Australia:

Lifeline Australia makes no active effort to collect personal information from Children under the age of 18. Children who do wish to submit information to Lifeline (to process a donation) should secure permission from their parent or legal guardian prior to doing so.

5.3 Collecting through our websites

Lifeline Australia has its own public website — www.lifeline.org.au. There are a number of ways in which we collect information through our website.

Analytics

We use Google Analytics and Liveperson to collect data about your interaction with our website. We host Liveperson ourselves, while Google Analytics is hosted by a third party. The sole purpose of collecting your data in this way is to improve your experience when using our site. The types of data we collect with these tools include:

- your device's IP address (collected and stored in an anonymized format);
- device screen size;
- device type, operating system and browser information;
- geographic location;

- referring domain and out link if applicable;
- search terms and pages visited; and
- date and time when website pages were accessed.

Cookies

Cookies are small data files transferred onto computers or devices by websites for record-keeping purposes and to enhance functionality on the website.

Our website generally sets the following cookies:

| | |
|---------------------------------|---|
| • <code>_gid</code> | Google Analytics |
| • <code>_gat_UA-390238-1</code> | Google Analytics |
| • <code>_ga</code> | Google Analytics |
| • <code>__cfduid</code> | Cloudflare – Cloud Security & Performance |
| • <code>LPVID</code> | LivePerson – Online Crisis Support |

Most browsers allow you to choose whether to accept cookies or not. If you do not wish to have cookies placed on your computer, please set your browser preferences to reject all cookies before accessing our website.

The core functionality on these platforms will be largely unaffected if you disable cookies in your browser but you may be unable to access some advanced functions.

Social Networking Services

We use social networking services such as Facebook and Twitter to communicate with the public about Lifeline services. When you communicate with us using these social networking services we may collect your personal information, but we only use it to help us to communicate with you and the public. The social networking service will also handle your personal information for its own purposes. These services have their own privacy policies. You can access the privacy policies for Twitter and Facebook on their websites.

NB: Lifeline Australia does not provide crisis support or suicide prevention services via Lifeline Australia's social media platform (Twitter, Facebook or Instagram).

6. Disclosure

6.1 General Disclosure Practices

We do not disclose personal information to another person or organisation (including police, emergency services and other government agencies) unless one of the following applies:

- the individual has consented to the disclosure of their personal information;
- the individual would reasonably expect, or has been told, that information of that kind is usually passed to those individuals, bodies or agencies and the disclosure:

- in the case of personal information (that is not sensitive information) relates to the primary purpose for which it was collected; or
 - in the case of sensitive information is directly related to the primary purpose for which it was collected; or
 - relates to collection from a third party outlined in section 5.2, that being a charitable or other likeminded organisation, including third party service providers who facilitate the sharing of information between such types of charitable or like-minded organisations; or
 - Contractors and service providers who perform services on our behalf, such as mailing houses, printers, information technology service providers, data matching and data washing service providers, database contractors and telemarketing agencies.
- the disclosure is otherwise required or authorised by law;
 - we reasonably believe that the disclosure will prevent or lessen a serious and imminent threat to somebody's life, health or safety (including your own) or serious threat to public health, property or public safety;
 - the individual has made threats to harm third parties;
 - the individual has made threats against Lifeline personnel;
 - the individual repeatedly makes nuisance contact including calls, chats or emails; or
 - the disclosure is to a Lifeline Australia service provider as described below.

6.2 Disclosure to service providers

Lifeline Australia uses a number of service providers to whom we disclose personal information. These include providers that host our website servers and CRM system.

To protect the personal information we disclose we:

- enter into a contract which requires the service provider to only use or disclose the information for the purposes of the contract;
- include special privacy requirements in the contract, where necessary.

6.3 Disclosure of personal information overseas

Web traffic information is disclosed to Google Analytics when you visit our websites. Google stores information across multiple countries.

When you communicate with us through a social network service such as Facebook or Twitter, the social network provider and its partners may collect and hold your personal information overseas.

Lifeline Australia's Customer Relationship Management Database (which hosts donation related information) is hosted on secure off-shore servers in the USA, Japan, Germany and Australia and accessed through the 'cloud'. We have taken reasonable steps to ensure that:

- the recipient of information which is being transferred is subject to a law, or binding scheme, that has the effect of protecting the information in a way that, overall, is at

least substantially similar to the way in which the Australian Privacy Principles protect the information; and

- there are mechanisms that you can access to take action to enforce that protection of the law or binding scheme.

7. Quality of personal information

To ensure that the personal information we collect is accurate, up-to-date and complete we apply the following data quality procedures:

- we record information in a consistent format and provide Lifeline Australia Members with an IT system to enable 13 11 14, Online Crisis Support Chat and Text4Good, that supports consistent recording;
- where necessary, confirm the accuracy of information we collect from a third party or a public source;
- promptly add updated or new personal information to existing records; and
- regularly audit our contact lists to check their accuracy.

We also review the quality of personal information before we use or disclose it.

The manner in which we apply the above data quality procedures depends on the nature of the personal information. For example:

- we do not create customer specific records (or records which are attributed to a specific person) for people who use Lifeline services such as the Online Crisis Support Chat Service, the 13 11 14 telephone service or the Text4Good service and accordingly, have little reason to update personal information that may be included in such records;
- we do not, as a matter of standard practice, confirm the accuracy of personal information provided by a third party using Lifeline services. We would only act on the information (irrespective of its quality) by disclosing it if we reasonably believe that the disclosure is necessary to prevent or lessen a serious and imminent threat to somebody's life, health or safety or serious threat to public health or public safety; and
- we keep employee specific employment records and accordingly update those records to include new personal information.

8. Storage and security of Information security

We take steps to protect the personal information we hold against loss, unauthorised access, use, modification or disclosure, and against other misuse. These steps include:

- only allowing personnel with a 'need to know' to access our IT systems and records;
- (where relevant) undertaking background checks on personnel who require access to our IT systems and records;
- password protection for accessing our electronic IT systems; and
- securing paper files in locked cabinets and physical access restrictions.

We also regularly engage independent information security experts to review and test our systems and processes. When no longer required, personal information is destroyed or

deleted in a secure manner in compliance with the Payment Card Industry standards, which governs Lifeline Australia's handling of payment card information.

9. Access and correction

Under the Privacy Act (Australian Privacy Principles 12 and 13) you have the right to ask for access to personal information that we hold about you, and ask that we correct that personal information.

You can ask for access or correction by contacting us and we must respond within 30 days. If you ask, we must give you access to your personal information, and take reasonable steps to correct it if we consider it is incorrect, unless there is a law that allows or requires us not to. For example, we will not give you access to your personal information if we reasonably believe that:

- giving access would have an unreasonable impact on the privacy of other individuals;
- giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety; or
- the request for access is frivolous or vexatious.

Individuals will be required to provide the following information before access or correction is undertaken:

- A written request for access and/or correct addressed to the Privacy Officer and sent either via email to secretariat@lifeline.org.au or via post to PO Box 173, Deakin West, ACT 2600.
- In order to enable us to conduct a record search of our crisis support and suicide prevention service data bases we require you to provide us the following information:
 - the date, time and number used to contact Lifeline's 13 11 14 service or Text4Good service; or
 - the date, time and IP address used to access Lifeline's online crisis support chat service.
- Proof of identity (this may be achieved through a number of means, including using the 100-point identification system and proof of contact number, certified through a legal practitioner, pharmacist, police officer or GP with an accompanying statutory declaration).

We will not provide access to personal information unless we are sure that the person seeking access is the person to whom the information relates, or the law otherwise supports such access. In some cases additional proof of identity information may be required or access may have to be denied because ownership of a record cannot be proven.

If we refuse to give you access to, or correct, your personal information, we will notify you in writing setting out the reasons.

If we make a correction and we have disclosed the incorrect information to others, you can ask us to tell them about the correction. We must do so unless there is a valid reason not to.

If we refuse to correct your personal information, you can ask us to attach a statement which indicates that you believe the information is incorrect, and why.

10. How to make a complaint or contact us

If you wish to contact us about a privacy matter or are concerned about the way we have handled your personal information, you can lodge a written request or complaint with our Privacy Officer at either of the following addresses:

Postal Address: PO Box 173, Deakin West, ACT 2600; or

Email Address: secretariat@lifeline.org.au

If you are dissatisfied with our investigation of your concerns, you can lodge a complaint to the Office of the Australian Information Commissioner who is independent of Lifeline Australia.