

PRIVACY POLICY

1. Purpose

- 1.1 Lifeline South East SA Inc. (LLSE) and parties who deal with our organisation will be informed of our commitment in relation to the protection of Stakeholder(s) privacy regarding Privacy Information collected, stored and administered, according to our Privacy Policy (*the Policy*).
- 1.2 *The Policy* outlines LLSE practices relating to the collection and management of Privacy Information, designed to protect our Stakeholder(s) and compliance to the *Privacy Act 1988 (Cth)*.

2. Scope

- 2.1 *The Policy* applies to all Stakeholder(s) associated with LLSE.
- 2.2 Staff failing to comply with *the Policy* requirements as detailed, will result in disciplinary action which may include summary dismissal.
- 2.3 Volunteers failing to comply with *the Policy* may face immediate standing down.
- 2.4 Contractors breaching Privacy Information requirements of LLSE may result in termination of their contract.

3. References

3.1 Legislation

- 3.1.1 *Privacy Act 1988 (Cth)*
- 3.1.2 *Privacy & Other Legislation Amendment Act 2024 (Cth)*

3.2 Lifeline South East (SA) Inc. Documents (Current Version)

- 3.2.1 Privacy Procedure
- 3.2.2 Information Sharing Procedure
- 3.2.3 Harassment & Grievance Procedure

3.3 Regulatory Guides

- 3.3.1 Premier & Cabinet – PC012 - Information Privacy Principles (IPPS) Instructions 2020 (South Australia)
- 3.3.2 Australian Information Commissioner – Privacy for Not for Profits (NFP's), including Charities
- 3.3.3 Australian Charities & Not for Profit (ACNC)– Managing Peoples Information & Data

4. Definitions

Contracted Service Provider (Contractor)

means a third party that enters into a contract with LLSE to provide goods or services required by LLSE for its operations.

LLSE Personnel

means LLSE staff, volunteers and long-term contractors of LLSE.

Personal Information

means information or an opinion (whether true or not) relating to a natural person or the affairs of a person whose identity is apparent, or can be reasonably ascertained from the information or opinion. This includes but is not limited to an individual's name, age, date of

	birth, phone number, email address, photograph, credit card details, technical and inferred data such as IP addresses, device identifiers and location data, and for the purposes of <i>the Policy</i> , salary and Credit Information and information collected from any surveys undertaken.
Sensitive Information	means information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record, health status, genetic or biometric templates, and that which may include Personal Information.
Stakeholder(s)	means an individual or a party that has an interest in LLSE as an organisation and can either affect, or be affected by the organisation, including but not limited to investors, staff, volunteers, clients, suppliers and contractors.

5. Policy Principles

- 5.1 LLSE may be required to obtain Privacy Information to actively address Stakeholder(s) specific needs and requirements regarding the services we offer and/or provide. In doing so we will ensure that we comply with our legal obligations in relation to management of Privacy Information.
- 5.2 In addition to the provisions of Section 5.1 of *the Policy*, Privacy Information collected by LLSE is for the purpose of:
 - Delivering administrative services associated with meeting government funding, monitoring or evaluating services provided;
 - Producing required reports or, for undertaking research activities; and/or
 - Administering employment conditions (refer to the LLSE - Privacy Procedure – Current Version).
- 5.3 LLSE will not collect Privacy Information by unlawful, unnecessary or unfair means, or that which is known to be inaccurate, or having regard to the purpose of collection, is relevant, out of date, incomplete or excessively personal.
- 5.4 Where Privacy Information is required to be collected by LLSE it will only be used for the purpose of relevancy, or for purposes relating to our services.
- 5.5 LLSE will undertake to ensure that internal safeguards are implemented, regularly monitored, and reviewed in order to protect any Privacy Information obtained, stored, and managed, as well as against loss, interference, unauthorised access, inappropriate disclosure, modification or other such misuse (refer to LLSE – Privacy Procedure – Current Version).
- 5.6 Privacy Information that LLSE obtains from Stakeholder(s) will only be disclosed to third parties with the informed, voluntary and written authority of the Stakeholder(s), unless required or authorised to do so by law, or is necessary under a permitted exception relating to safety, serious risk or legal obligation.
- 5.7 Any written authority must clearly identify the Stakeholder(s), the third party authorised to receive the information, the specific information that may be disclosed, the purpose of disclosure, the period for which the authority applies, and any limitations or conditions placed on the disclosure.

- 5.8 An authority to disclose a Stakeholder(s) Privacy Information must be documented, and managed securely by LLSE in accordance with *the Policy*, the LLSE - Privacy Procedure and the LLSE - Information Sharing Procedure (Current Versions).
- 5.9 Prior to any disclosure of Privacy Information, LLSE will take reasonable steps to confirm that the Stakeholder(s) understands the nature and consequences of providing authority, what information will be shared, with whom it will be shared, why it is being shared, and awareness the Stakeholder(s) may withdraw or vary their authority at any time, unless disclosure has already occurred or is otherwise required by law.
- 5.10 LLSE will advise the Stakeholder(s) of their right to erasure (i.e.: the “right to be forgotten”) and their right to object to targeted advertising and profiling, as well as their right in understanding they can seek compensation for serious breaches of Privacy regarding any Privacy Information we obtain.
- 5.11 A Stakeholder(s) who believes their Privacy Information has been released by LLSE without their written consent, may submit a complaint to either the LLSE - CEO or the Board of Governance - Chairperson (or delegate) (refer to LLSE - Harassment & Grievance Procedure – Current Version) the Office of the Australian Information Commissioner (OAIC) or, in confidence to an independent external third party.
- 5.12 *The Policy* has been developed in consultation and collaboration with the LLSE Board of Governance, our staff/volunteers, and will be reviewed as pertinent legislation is amended, or as circumstances at LLSE change, but no less than each five (5) years.