

Jawun Privacy Policy

Jawun is required to comply with the Australian Privacy Principles (APPs) in the *Privacy Act 1988* (Cth) (Privacy Act). The APPs regulate the manner in which personal information is handled throughout its life cycle, from collection/receipt to use and disclosure, storage, accessibility and disposal. Employee records are specifically exempt from the provisions.

Jawun is committed to protecting the privacy of the personal information it collects and receives. This Privacy Policy seeks to explain how Jawun collects, uses, discloses and otherwise handles personal information. It also seeks to explain how you can ask to access and correct the personal information we hold about you or complain about any suspected privacy breach.

A copy of this Privacy Policy is available on the Jawun website. A printed copy can be obtained free of charge by contacting our Privacy Officer (details below).

Personal Information

Personal information means information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is either identified or reasonably identifiable. Examples include an individual's name, address, contact number and email address.

Collection and Holding of Information

Jawun collects and holds personal information solely to carry out its functions and/or activities in:

- administration and operation of our Secondment program;
- administration and operation of our Executive Visit program;
- organising and holding discussion groups and/or events to consider topics of interest to the corporate and government partners and Indigenous regional organisations;
- conducting surveys for service improvement purposes and to compile statistics and analyse trends;
- distributing Jawun publications and newsletters;
- recruiting staff and contractors;
- processing payments;
- answering queries and resolving complaints; and
- using aggregated information for business analysis

Where reasonable and practicable, Jawun will collect personal information directly from the person and inform the person that this is being done.

Where information is collected from a third party, Jawun's policy is to take reasonable steps to make sure that you are made aware of the collection and, if you may not be aware that that we have collected the information, of the fact and circumstances of the collection.

Sensitive Information

Sensitive information is a subset of personal information that is generally afforded a higher level of privacy protection. Sensitive information includes health and genetic information and information about 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 and some types of biometric information.

Jawun will not collect sensitive information without the consent of the person to whom it relates unless the collection is required by law, is necessary to prevent or lessen a serious and/or imminent threat to the person's (or another person's) life or health, or is necessary in relation to legal proceedings (current, anticipated or potential).

Unsolicited Personal Information

Unsolicited personal information is personal information we receive that we have taken no active steps to collect (such as an employment application sent to us by an individual on their own initiative, rather than in response to a job advertisement). We may keep records of unsolicited personal information, if the information is reasonably necessary for one or more of our functions or activities. If not, Jawun's policy is to destroy or de-identify the information as soon as practicable, provided it is lawful and reasonable to do so.

Collection of Information

Jawun is required by the Privacy Act also to collect personal information only by lawful and fair means. Where it is reasonable and practicable, we will collect personal information we require directly from you. We collect personal information in a number of ways, including:

- by email;
- over the telephone;
- through written correspondence (such as letters, faxes and emails);
- on hard copy forms (including secondment forms, executive visit forms and surveys);
- in person (for example, at job interviews);
- at seminars and functions (for example, if you fill out an assessment form or leave us your business card);
- electronic systems such as Applications;
- from third parties, including:
 - corporate, philanthropic and government partners that assist us in running our secondment programs);
 - Indigenous organisations in relation to our programs; and
 - public sources, such as telephone directories, membership lists of business, professional and trade associations, and ASIC searches.

Use and Disclosure of Information

Jawun may use personal information for its primary purpose of collection (e.g. the administration and operation of the Executive Visit or Secondment Program) or for any related secondary purpose that we could reasonably be expected to use the personal information for.

Under Jawun's policy, personal information may be disclosed to the following third parties where appropriate:

- Jawun staff or Indigenous organisations (as a duty of care)
- Suppliers (e.g. dietary requirements for meals, drivers licences for car hire)
- Financial institutions for payment processing

In certain circumstances, Jawun may use personal information for promotional or direct marketing purposes. However, a person may at any time request Jawun not to use their personal information for sending direct marketing material to that person. Such a request can be made by contacting Jawun either in writing, by email or by telephone at the contact details below. There is no fee for making such a request.

Ensuring Data Quality

We try to ensure our information is accurate, up-to-date, complete, relevant and not misleading. Information from third parties is checked with the individual where possible, and we review applicable personal details regularly with ongoing individuals. You can also help us keep your information up to date by letting us know about any changes to your personal information, such as your email address or phone number.

Ensuring Data Security

All personal and sensitive information is held under secure conditions with access restricted to those individuals who need it to carry out their work under Jawun's programs. This ensures that the information is protected from misuse, interference, loss, unauthorised access, modification or disclosure.

Personal and sensitive information is destroyed or de-identified when it is no longer needed.

Access to Information and Correction of Information

It is Jawun's policy to give individuals access to their data on request, so that they may review and correct details.

We will take reasonable steps to ensure that the person seeking access is in fact the individual to whom the data relates; or is otherwise entitled to access the data. If access is denied or refused, we will provide reasons for this decision.

Use of Identifiers

Jawun's policy is to not to use a government related identifier of an individual (such as a Medicare number or driver's licence number) as our own identifier of individuals; or otherwise use or disclose such a government related identifier (with the exception of driver's licences to car hire companies).

Anonymity

Jawun allows individuals to act anonymously where it is practical and lawful to do so. For example, we will accept anonymous donations, but are unable to issue a tax-deductible receipt to the donor in such circumstances.

Cross Border Data Flows

No data is sent overseas.

Maintaining Financial Records

Jawun maintains a database of suppliers, customers and other contacts with which it engages in

financial transactions. The computerised financial system operated by Jawun accesses this database in order to process financial transactions.

The information held in the database for each contact consists of the contact's name, address, telephone numbers and one or more identifiers necessary for effective financial processing.

The information is not made available to any third party except to Australian government agencies as required by law.

Queries, Advice and Complaints

Please contact Jawun if you have any queries about the personal information that Jawun holds about you or the way we handle that personal information. Our contact details for privacy queries are set out below.

Privacy Officer
Jawun
PO Box A199
Sydney South NSW 1235
E: info@jawun.org.au
P: + 61 2 8254 6161
F: +61 2 9233 1963

If you are dissatisfied with the response that you receive you may seek advice from the Federal Privacy Commissioner on 1300 363 992.