

The Karuna Hospice Services Limited



Privacy Statement

1. We value your privacy

The Karuna Hospice Service Limited (**Karuna**) recognises the importance of protecting the privacy of individuals; and has implemented systems in order to do all that is reasonably practicable to safeguard personal information and comply with Australian privacy law including the Australian Privacy Principles (**APPs**) as set out in the *Privacy Act 1988* (Cth).

This Privacy Statement explains our privacy policy and outlines how we manage personal information including:

- the kinds of personal information that Karuna collects and holds;
- how Karuna collects and holds personal information;
- the purposes for which Karuna may collect, hold, use and disclose personal information;
- how a person may access their personal information and if necessary, seek correction;
- how a person may complain about a perception that the APPs have been breached in some way; and how Karuna will deal with any complaint; and
- as applicable, whether Karuna is likely to disclose personal information to overseas recipients (if ever) and if so, the relevant countries.

2. Australian Privacy Principles

To protect the privacy of individuals, Karuna has adapted its privacy policy and procedures to comply with the APPs being:

Privacy considerations	APP
Consideration of personal information privacy	1 Open and transparent management of personal information
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3. What do we mean by personal information?

'Personal information' means information or an opinion (including as part of a database) about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not; and whether recorded in a material form or not. Personal information includes sensitive information and may include photographs.

'Sensitive information' means health information, genetic and biometric information; and also information about racial or ethnic origin, political opinions or membership, religious beliefs or affiliations, philosophical beliefs, memberships of professional or trade associations or unions, sexual orientation and criminal records.

4. How do we protect your privacy?

Karuna adopts the APPs by implementing the following strategies.

Consideration of privacy

APP 1. Open and transparent management of personal information

Karuna will do all that is reasonably practicable to manage your personal information in an open and transparent manner including posting this Statement on our website; making it available free of charge, electronically or in hardcopy to anyone who requests it; and referencing this Statement on outgoing emails.

APP 2. Anonymity and pseudonymity

Karuna will give individuals the option if requested, of not identifying themselves, or of using a pseudonym, unless do so would be impracticable; or unless Karuna is required or authorized by Australian law to do otherwise.

Collection of personal information (solicited or otherwise)

APP 3. Collection of personal information

We may collect and hold personal information about you, including your name, date of birth, gender, address, phone numbers, facsimile number, email address, health information, credit card details, and / or other information and data relevant to providing you with the services you are seeking.

The type of personal information that we collect and hold about you, depends on your interaction with us. Generally, we will collect and hold your personal information for the purpose of:

- Providing services to you;
- Providing you with information about other services we offer that may be of interest to you;
- Accepting the generous donations you make;
- Providing you with information about other fund raising ventures that we are undertaking;
- Facilitating our internal business operations, including the fulfillment of any legal requirements; and
- Recording statistical data.

We will generally collect your personal information directly from you. There may, however, be some instances where personal information about you will be collected indirectly because it is unreasonable or impractical to collect personal information directly from you. We will usually notify you about these instances in advance, or where that is not possible, as soon as reasonably practicable after the information has been collected.

Cookies

Also, our website uses cookies. A cookie is a message given by a web server (that is, a computer that delivers or serves up pages on the world wide web) to a web browser (that is, software, such as Microsoft Internet Explorer, used to locate and display pages on the world wide web). The web

browser stores the message in a text file. The message is then sent back to the web server each time the web browser requests a page from the web server.

The main purpose of cookies is to identify users and to prepare customized web pages for them. When you enter a website using cookies, you may be asked to fill out a form providing such information as your name and interests. This information is packaged into a cookie and sent to your web browser, which stores it for later use. The next time you go to the same website, your web browser will send the cookie to the web server. The web server can then use this information to present you with customized web pages. So for example, instead of seeing just a generic welcome page, you might see a welcome page with your name on it.

Cookies do not identify you personally, but they may link back to a database record about you. If you registered on our website, we will then link your cookie back to your personal information details.

We use cookies to monitor usage of our website and to create a personal record of when you visit our website and what pages you view so that we may serve you more effectively.

The importance of accurate and complete personal information

Please keep in mind that if the personal information you provide to us is not accurate and up to date, or is incomplete or misleading, we may be unable to provide you with the services you are seeking.

Lawful and fair collection

We only collect personal information by lawful, fair means and only where reasonably necessary for our functions or activities. For example, for health information, Karuna will collect information necessary to provide the health service (or to manage, fund or monitor the service) in a manner congruent with our obligations of professional confidentiality. For other Sensitive Information, we will obtain your consent to the collection (unless the collection is required or authorized by or under an Australian Law; or the information relates solely to members or persons with regular contact with us or our activities).

APP 4. Dealing with unsolicited personal information

If we receive personal information that we did not collect or solicit; we will consider whether or not we *could* have collected the information under APP 3 (that is by lawful fair means reasonably necessary to our functions or activities). If the answer to this query is "No" where lawful and reasonable to do so, we will destroy or de-identify the personal information. If the answer is "Yes", APPs 5 to 13 will be applied as if we had collected the personal information under APP 3.

APP 5. Notification of the collection of personal information

Karuna will as soon as practicable, take such steps as are reasonable in the circumstances to ensure that individuals are made aware of:

- the personal information we may have collected about them from another source;
- the purpose of the collection;
- the main consequences of a failure to collect (if any);
- other entities or persons (if any) to whom the personal information may be disclosed; and
- the fact that our privacy policy defines how individuals may access their personal information; seek correction; complain and if applicable, whether the personal information will be disclosed to overseas recipients (and if so which countries).

Dealing with personal information

APP 6. Use or disclosure of personal information

Where Karuna holds personal information for a particular purpose it will not use or disclose the information for another purpose unless:

- the person whose personal information is held:
 - has consented to the use / disclosure for the secondary purpose; or
 - would reasonably expect us to use / disclose the personal information for the secondary purpose (and the secondary purpose is *related* to or for Sensitive Information, *directly related* to the first purpose); or
- the use / disclosure is required or authorised by Australian Law; or
- the use / disclosure is necessary for provision of the health service (or the management, funding or monitoring of the health service; or health research or statistics); and it is impracticable to obtain the consent; and the use / disclosure is conducted in accordance with relevant obligations of professional confidentiality; and Karuna reasonably believes the recipient will not disclose the personal information. Additionally, we will take such steps as are reasonable in the circumstances to de-identify any data released to funding bodies.

Generally, we only use and/or disclose personal information about you for the purposes for which it was collected (as set out above). Although, we may disclose personal information about you to:

- service providers, who assist us in operating our business;
- our related entities; and
- Regulatory bodies as required by law.

APP 7. Direct marketing

Karuna uses personal information (other than sensitive information) for direct marketing where it collected the information from the individual in circumstances in which the person would reasonably expect Karuna to use/disclose the information for this purpose. In other circumstances, such as where Karuna obtains the personal information for direct marketing from another source, the option not to receive the marketing material is clearly and prominently visible on the marketing materials. The option and process to request to be taken off the marketing mailing list is placed on all Appeal letters and Karuna newsletters.

APP 8. Cross-border disclosure of personal information

Karuna does not routinely disclose personal information to overseas recipients. If it becomes necessary for some reason to disclose information to overseas recipients, we will take such steps as are reasonable in the circumstances to ensure that:

- the overseas recipient does not breach the APPs (other than APP 1) or protects the personal information in a similar way (which an individual can enforce);
- the individual is informed and consents; or
- the disclosure is required or authorized by Australian Law.

Sensitive information (including health information) is not sent overseas. Our client records system is stored and backed up in Australia.

APP 9. Adoption, use and disclosure of government related identifiers

Karuna will not generally adopt, use or disclose a government related identifier of an individual as its own identifier of the individual unless: required or authorized by Australian Law; or it is reasonably necessary to verify the identity of the individual for Karuna's activities or functions.

Integrity of personal information

APP 10. Quality of personal information

Karuna will take such steps as are reasonable in the circumstances to ensure that the personal information it collects, uses or discloses is accurate, up-to-date, complete and relevant to purpose.

APP 11. Security of personal information

We store your personal information in different ways, including in paper and in electronic form. The security of your personal information is important to us.

Karuna will take such steps as are reasonable in the circumstances (including as provided in our Information Security Policy) to protect stored personal information from misuse; interference; loss; or unauthorised access, modification or disclosure including:

- confidentiality agreements being signed by all staff, consultants, contractors and volunteers, students, work placement persons and research project personnel who are in contact with families or working in the Karuna office;
- electronic and physical security measures; and
- confidential information is shredded as and when appropriate.

Access to and correction of personal information

APP 12. Access to personal information

You may access personal information we hold about you, by making a written, signed request. We will do all that is reasonably practicable to acknowledge your request within 14 days of receipt and to provide you with access to the information requested within 30 days. We may charge you a reasonable fee for processing your request.

We may decline a request for access to personal information in circumstances prescribed by the *Privacy Act 1988* (Cth).

APP 13. Correction of personal information

If, upon receiving access to your personal information or at any other time, you believe the personal information we hold about you is not accurate, up to date, complete, and relevant or is misleading, please notify us immediately.

We will take such steps as are reasonable in the circumstances (having regard to the personal information and the purpose for which it is held, used or disclosed) to:

- correct the personal information to ensure it is accurate, up to date, complete, relevant and not misleading; and
- appropriately respond to requests to correct personal information; including providing notice and the means of complaint if we believe it is not appropriate to change the personal information.

If we disagree with you about whether your personal information is accurate, up to date, complete, relevant or is misleading; and you ask us to associate with your personal information a statement claiming that your personal information is not accurate, up to date, complete, relevant or is misleading, we will take reasonable steps to do so.

5. Contact us

If you have any queries or concerns about our privacy policy or the way in which we handle your personal information, please contact our Business Manager at:

Karuna Hospice Services
PO Box 2020,
WINDSOR QLD 4030
Tel: 07 3632 8300
karuna@karuna.org.au

For more information about privacy in general, you can visit the Federal Privacy Commissioner's website at www.privacy.gov.au.