

# PRIVACY POLICY

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| <b>Endorsed by Board:</b> 21 June 2018 | <b>Review Date:</b> June 2021 |
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## Introduction and Purpose

Leading Age Services Australia Ltd (LASA) is committed to respecting the privacy of its customers and stakeholders and adheres to the Australian Privacy Principles as set out in the Privacy Act 1988 (Cth) and the Privacy Amendment (Private Sector) Act 2000 (Privacy Act). The Australian Privacy Principles govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information. A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au).

This Policy outlines our ongoing obligations to you in respect of the way in which we manage your Personal Information and/or Sensitive Information which we may collect.

## What is Personal Information?

Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we collect includes (but not limited to), names, addresses, email addresses, telephone and facsimile numbers.

Some Personal Information is further classified as Sensitive information, which is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information, etc.

## How we collect Personal Information

LASA collects Personal Information from a number sources including:

- Directly from the individual to whom the information relates;
- From companies about their employees and contractors;
- From companies about their customers and suppliers; and
- For marketing purposes, from business associates, potential clients and other third party sources.

Personal Information may be obtained in many ways including correspondence, by telephone and facsimile, in writing, by email, via our website at [www.lasa.asn.au](http://www.lasa.asn.au), from your website, from media and publications, from other publicly available sources, from cookies and other tracking technology, static documents such as letters, memos, from third parties, etc.

In addition, LASA uses social networking services such as Facebook, Twitter, YouTube and LinkedIn to communicate broadly with the public. We may collect your Personal Information to help us communicate with you and the public. Personal information is commonly collected when individuals register to attend a LASA event/forum, register for a training program, are added to our newsletter subscription services or when organisations provide employee details when managing LASA Membership, Affiliation subscription or other services delivered by LASA.

We collect your Personal Information for the Primary Purpose of providing our services to you, and for providing information to our clients and for marketing purposes. We may also use your Personal Information for Secondary Purposes closely related to the Primary Purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing or by using the 'unsubscribe' link on broadcast email communications.

When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

In collecting Personal Information, LASA will not do anything, or engage in any practice, that contravenes the Australian Privacy Principles including:

- Not collecting Personal Information unless the information is collected for a lawful purpose that is related to a function or activity of LASA, and is reasonably necessary for that purpose; and
- Not collecting personal or commercial information by any unlawful means.

Any visitor to the LASA website may visit the site without revealing their identity or any Personal Information.

In accordance with current standards, our servers automatically recognise and record each visitor's source IP address, date and time of visit, time spent on individual pages and pages viewed, but only discloses to us anonymous statistical data, which we need to evaluate our website performance and generally improve our website over time.

### Use of your Personal Information

LASA undertakes to use information only for:

- The purposes for which it was collected or a Secondary Purpose that you would reasonably expect us to use or disclose the information and is related to the Primary Purpose;
- Such other purposes as are subsequently agreed between LASA and you; and
- Such additional purposes as are authorised by law (in particular to protect LASA's interests, e.g. if it believes on reasonable grounds that you have failed to fulfil your undertakings to LASA or have committed a breach of the law. In these circumstances, LASA will take any reasonable steps available to it to communicate to you that the use has occurred, unless it is precluded from doing so by law.

Sensitive Information will be used by us only:

- For the Primary Purpose for which it was obtained;
- For a Secondary Purpose that is directly related to the Primary Purpose; and
- With your consent; or where required or authorised by law.

Specifically, we use your Personal Information to:

- Maintain your organisation's LASA Membership or Affiliation subscription and appropriate records (for Members and Affiliates only);
- Communicate with you to provide your organisation's Membership or Affiliate benefits, including but not limited to:
  - Key LASA and industry news via e-communications;
  - Responses to your queries by our staff or contractors;
  - Advice of upcoming LASA events, workshops, forums and training opportunities;
  - Advice to Member Representatives of Director election and General Meeting related information;

- Undertake market research, Member satisfaction and other surveys and Member data analysis;
- Provide you with promotional information about our products and services that may be of interest;
- Provide you with information to support your learning outcomes and information regarding our courses;
- Provide you with updated information on events you have registered for;
- Provide you with access to promotions and discounts from time to time;
- Process applications or nominations for Director and Committee positions or for positions on external Boards;
- Monitoring whether you have opened e-communications;
- Deliver business products and services requested by you;
- Tailor and enhance our products and services to you;
- Administer and support our service delivery, including billing and debt collection; and
- Communicate with you.

### Disclosure of your Information

In certain instances, we may disclose your Personal and/or Sensitive Information to certain third parties so that they may use and disclose your Information for any of the purposes referred to above.

When we disclose your information to a third party who is providing services to us, we will require the third party to protect your information in accordance with the Privacy Act and treat it confidentially, through the contacts of service we sign with them. Such third parties may include, but are not limited to:

- Third party software platforms (such as Mail Chimp, Meltwater, Memnet (for email communications), Cvent, Eventsair or similar (for event management), Memnet, Axcelerate and other databases;
- Government agencies;
- Auditors;
- Insurers (including Workcover Insurers);
- Legal advisors;
- External organisations, including publishing and mailing houses, who may be contracted to deliver a service on our behalf, including magazines and journals
- Independent returning officers appointed for election purposes;
- Consultants and contractors engaged undertake services requested by you on your behalf; and
- Debt collection agencies.

### **Disclosure to Overseas Recipients**

As mentioned above, LASA uses a number of third party products to provide its marketing and communication services. These include, but are not limited to, Mail Chimp, Meltwater for communications, social media platforms such as Facebook, Twitter, LinkedIn, YouTube and Cvent. These service providers are located overseas, and therefore require LASA to send Personal Information it holds overseas for the purpose of its communications, marketing and event management.

LASA is not accountable for the actions of an overseas third party with regard to the use of information, and there is no redress under the Privacy Act should the overseas third party breach the Australian Privacy Principles. Additionally you may not be able to seek redress in the overseas jurisdiction. You should also be aware that the overseas third party may not be subject to the same privacy obligations and may be compelled to disclose Personal Information to a further third party by an overseas authority. It should be noted that if you opt

out of these marketing and communication services, LASA will not disclose your Personal Information to the overseas third party.

To the extent possible, when utilising the services of overseas providers, LASA ensures that these external providers have appropriate controls to manage the privacy of the information they hold.

### Security of Personal Information

We hold Personal Information in hardcopy and electronic formats. LASA takes reasonable steps to ensure that Personal Information we hold is secure and protected from misuse, loss, unauthorised access, modification or disclosure.

Reasonable steps are taken to hold information secure in an electronic or physical form. Information is stored in access controlled premises using lockable cabinets or in electronic servers and databases with restriction of access, use of logins, passwords and firewalls and other security measures. All staff having access to confidential information are subject to confidentiality obligations.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of seven years.

### Data Breaches

Under the Privacy Amendment (Notifiable Data Breaches) Act 2017, we must report certain data breaches to the Office of the Australian Information Commissioner and the impacted individuals when a data breach has occurred and is likely to result in serious harm to any individuals whose Personal Information is involved in the breach.

### Access and Correction

You have rights under the Australian Privacy Principles to request access to and correction of information we hold about you. We encourage you to advise us of any personal detail changes as they occur.

To access or correct your data, please contact the LASA Privacy Officer via:

Phone: 1300 111 636  
Email: [info@lasa.asn.au](mailto:info@lasa.asn.au)  
Post: LASA Privacy Officer  
PO Box 4774, Kingston, ACT, 2604

### Enquiries and Complaints

If you have any queries regarding privacy at LASA, or would like to enquire or make a complaint about a breach of your privacy, please contact the LASA Privacy Officer at the above address. We will respond to you within 30 days of receipt of your complaint. Should you not be satisfied with the resolution of your complaint by LASA, you can contact the Office of the Australian Information Commissioner on 1300 363 992 or via email at [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au).