

A. ABOUT THIS PRIVACY POLICY

1. Community Options Australia Limited ACN 606 404 127 (**COA**) has obligations regarding the collection, use, disclosure and storage of personal information. These obligations are set out in the Australian Privacy Principles (**APPs**) under the *Privacy Act 1988* (Cth) (**Privacy Act**), and other applicable State and Territory privacy laws.
2. In this Privacy Policy, references to "we", "us" or "our" are to COA.
3. We will review and may update this policy from time to time. The current version is available on our website at <https://www.communityoptions.net.au> (**COA Website**).
4. We are committed to protecting the privacy of personal information which we collect, use disclose and store in accordance with the APPs and the Privacy Act.

B. WHAT IS PERSONAL INFORMATION

5. Personal information is information that relates to an individual and directly or indirectly identifies that individual.
6. In the ordinary course of our activities, we collect personal information from a range of individuals including our customers, prospective customers, prospective employees and contractors.
7. We collect personal information for the purposes of:
 - a. managing and performing contracts with our customers, prospective customers, prospective employees and contractors including providing services under those contracts and sending related communications;
 - b. processing applications for membership and updating members' details;
 - c. conducting, improving, maintaining and developing business relationships with our funders, customers, prospective customers, prospective employees and contractors including responding to an individual's queries;
 - d. preparing for and running conferences, seminars and workshops;
 - e. providing training programs for our employees and other staff members and contractors;
 - f. developing, improving and maintaining the COA Website and social media accounts; and

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- g. administering and conducting our digital media activities, including Facebook and LinkedIn and for other informational and marketing purposes including providing individuals with information about our services.
8. The types of personal information that we may collect includes:
- a. an individual's:
- i. name;
 - ii. title;
 - iii. address;
 - iv. date of birth;
 - v. email address;
 - vi. social media handles;
 - vii. telephone number and other contact details;
 - viii. online passwords related to use of our services;
 - ix. bank account details;
 - x. tax file number;
 - xi. records of communications with COA;
 - xii. COA Website usage information; and
 - xiii. workplace; and
- b. sensitive information, including health information:
- i. derived from case notes; and
 - ii. referral information from health care professionals, including information in relation to social, domestic and/or clinical circumstances of individuals.
9. The types of personal information that we collect from individuals will vary depending on the transaction and the nature of that particular dealing.

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C. TO WHOM DO WE DISCLOSE PERSONAL INFORMATION?

10. We may disclose personal information to the following third parties for the purposes listed above:
- COA's parent company and other related companies (**Group Entities**); and
 - our funders; and
 - trading partners, research and service partners and collaborators, and service providers (of COA and Group Entities).
11. In addition to clause 17, we may disclose Personal Information to third parties in circumstances including where:
- the individual would reasonably expect the disclosure to occur (for example, for quality assurance purposes or training);
 - where we are authorised by, or compelled under, law to make the disclosure;
 - to prevent or lessen a serious threat to the life, health or safety of another individual or to public health or safety;
 - where it is necessary as part of the establishment or defence of a legal claim;
 - where it is requested by an enforcement agency, including the police; and
 - where it is a necessary part of an investigation following a complaint or incident regarding the personal information retained by COA.
12. When we disclose personal information to third parties, we take all reasonable steps to ensure that we only disclose information that is necessary for the purposes for which it was disclosed, that is the information is accurate, complete and up to date and that the third party will comply with the Privacy Act in relation to that information.
13. COA will not sell or license any personal information that it collects from or about an individual.

D. DISCLOSURE OF PERSONAL INFORMATION OUTSIDE AUSTRALIA

14. COA does not disclose personal information to anyone outside Australia.

E. DATA SECURITY

15. COA is bound by laws that impose specific obligations in respect of the

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collection, use and disclosure of personal information. As a result, COA has adopted the following principles which act as minimum standards for its collection, use and disclosure of personal information. In the course of performing contracts with our customers, prospective employees and contractors, we may receive sensitive health information and will take reasonable steps to ensure the privacy and confidentiality of this information.

16. We will:

- a. only collect personal information that is reasonably necessary for the performance of contracts with our customers, prospective employees and contractors;
- b. take reasonable steps to ensure that our customers, prospective customers, prospective employees and contractors are informed of the reasons we collect, use and disclose personal information;
- c. only use and disclose health information for the purposes set out in clause 7 with the prior consent of the individual to which the health information relates or as permitted or required by law;
- d. store personal information securely, protecting it from unauthorised access;
- e. provide customers, prospective customers, prospective employees and contractors with access to their own information, provided they can provide adequate proof of identity, and the right to seek its correction; and
- f. ensure an up-to-date privacy policy is publicly available via the COA Website.

17. COA has systems and procedures in place to protect personal information from misuse and loss, unauthorised access, modification and disclosure including restricting access to the information in electronic format and by appropriate physical and communications security.

18. There are, however, inherent risks in transmitting information across the internet including the risk that information sent to or from a website may be intercepted, corrupted or modified by third parties. If you have security concerns or wish to provide personal information by other means (e.g. by telephone or paper), you may contact us via the means set out at the end of this policy.

F. HOW CAN I ACCESS OR CORRECT MY PERSONAL INFORMATION?

19. COA has measures in place to ensure that the personal information we hold about individuals is accurate, complete and up to date. If you learn that personal information we hold about you is inaccurate, incomplete or not up to date, you should contact us as soon as possible so that the information can be updated

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via the means set out at the end of this policy. We will use reasonable endeavours to comply with an individual's request to correct their personal information, but reserve all rights to refuse to correct or update your personal information.

20. If you wish to see what personal information we hold about you, you can ask us for a copy. Sometimes, however, it may not be possible to give you a copy of the information if it was provided anonymously, if it contains details about other people or if it would be unsafe to provide the information (for instance, if it may lead to harm being done to another person).
21. If we refuse to provide you with access to your personal information we hold about you or to update your personal information in the way you request, we will provide you with written reasons.
22. If we refuse to correct or update your personal information, you may request that we make a note on your record that you are of the opinion that the information is inaccurate, incomplete, out of date, irrelevant or misleading, as the case may be.
23. We will not charge you for requesting details of the personal information we store about you, but we may charge a reasonable fee for the work involved in providing you with this information and for associated costs such as photocopying. You will be notified of any likely costs before your request is processed.

G.HOW CAN YOU MAKE A COMPLAINT?

24. If you have a complaint or concern regarding our handling of your personal information or think that your privacy has been interfered with, you should contact COA via the means below for consideration of your complaint or concern. Complaints about privacy can also be made to the Office of the Australian Information Commissioner - see www.oaic.gov.au for how to process making a complaint.

Contact us

Email: info@communityoptions.net.au

Phone: 1300 136 606

Postal address

The Privacy Officer

Community Options Australia

PO Box 190

Artarmon NSW 1570

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H.RESPONSIBILITIES

1. The Chief Executive Officer (CEO):
 - a. is responsible for developing, adopting and reviewing this policy;
 - b. is responsible for the implementation of this policy, monitoring changes in Privacy legislation and advising on the need to review or revise this policy as and when the need arises; and
 - c. acts as Privacy Officer and manages all written requests to access personal information as per the requirements of the legislation.
2. COA employees and contractors:
 - a. must adhere to this policy in the conduct of COA business and activities; and
 - b. must ensure all written material states that a person receiving funded support can access their personal information as per the procedure. This applies to any form of communication that customers, prospective employees and contractors may access.

Andrew Harvey

CEO, name



Signature

9 February 2021

Date

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