

PRIVACY POLICY 2020

Policy number	PP-1.3	Version	1.0
Drafted by	Robyn Tredinnick	Approved by Board on	29/04/2020
Responsible person	Robyn Wight	Scheduled review date	29/04/2021

Introduction

The Committee of Groomed to Go Inc. is committed to protecting the privacy of personal information that the organisation collects, holds and administers. Personal information is information which directly or indirectly identifies a person.

Purpose

The purpose of this document is to provide a framework for Groomed to Go Inc. in dealing with privacy considerations.

Policy

Groomed to Go Inc. collects and administers a range of personal information for the purposes of conducting its services. The organisation is committed to protecting the privacy of the personal information it collects, holds and administers.

Groomed to Go Inc. recognises the essential right of individuals to have their information administered in ways which they would reasonably expect – protected on one hand and made accessible to them on the other. These privacy values are reflected in and supported by our core values and philosophies, and also reflected in our Privacy Policy, which is compliant with the Privacy Act 1988 (Cth).

Groomed to Go Inc. is bound by laws which impose specific obligations when it comes to handling information. The organisation has adopted the following principles contained as minimum standards in relation to handling personal information.

Groomed to Go Inc. will:

- Collect only information that the organisation requires for its primary function;
- Ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered;
- Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent;
- Store personal information securely, protecting it from unauthorised access; and
- Provide stakeholders with access to their own information, and the right to seek its correction.

Authorisation

Robyn Wight

Secretary

29/04/2020

Groomed to Go Inc.

PRIVACY PROCEDURES

Procedures number	P-1.3	Version	1.0
Drafted by	Robyn Tredinnick	Approved by GM on	29/04/2020
Responsible person	Sandy Gregory	Scheduled review date	29/04/2021

Responsibilities

Groomed to Go Inc.'s Committee is responsible for developing, adopting and reviewing this policy.

Groomed to Go Inc.'s GM is responsible for the implementation of this policy, for monitoring changes in Privacy legislation, and for advising on the need to review or revise this policy as and when the need arises.

Processes

Collection

Groomed to Go Inc. will:

- Only collect information that is necessary for the performance and primary function of Groomed to Go Inc.
- Notify stakeholders as to why we collect the information and how it is administered.
- Notify stakeholders that this information is accessible to them.
- Collect personal information directly from the person wherever possible.
- If collecting personal information from a third party, be able to advise the person whom the information concerns, from whom their personal information has been collected.
- Collect sensitive information only with the person's consent. (Sensitive information includes health information and information about religious beliefs, race, gender and others.)
- Determine, where unsolicited information is received, whether the personal information could have collected it in the usual way, and then if it could have, it will be treated normally. (If it could not have been, it must be destroyed, and the person whose personal information has been destroyed will be notified about the receipt and destruction of their personal information.)

Use and Disclosure

Groomed to Go Inc. will:

- Only use or disclose information for the primary purpose for which it was collected or for a directly related secondary purpose.
- Obtain consent if personal information is used for any other purposes.
- Only use or disclose the personal information for a secondary purpose where:
 - ◆ a secondary purpose is related to the primary purpose and the individual would reasonably have expected Groomed to Go Inc. to use it for this purpose; or
 - ◆ the person has consented; or
 - ◆ certain other legal reasons exist, or disclosure is required to prevent serious and imminent threat to life, health or safety.

- In relation to personal information that has been collected from a person, use the personal information for direct marketing, where that person would reasonably expect it to be used for this purpose, and Groomed to Go Inc. has provided an opt out and the opt out has not been taken up.
- In relation to personal information that has been collected other than from the person, only use the personal information for direct marketing if the person whose personal information has been collected has consented (and they have not taken up the opt out).
- State in Groomed to Go's privacy policy whether the information is sent overseas and further will ensure that any overseas providers of services are as compliant with privacy as Groomed to Go Inc. is required to be.
- Provide all individuals with access to personal information except where it is a threat to life or health or it is authorised by law to refuse and, if a person is able to establish that the personal information is not accurate, then Groomed to Go Inc. must take steps to correct it. Groomed to Go Inc. may allow a person to attach a statement to their information if Groomed to Go Inc. disagrees it is inaccurate.
- Where for a legal or other reason Groomed to Go Inc. are not required to provide a person with access to the information, consider whether a mutually agreed intermediary would allow sufficient access to meet the needs of both parties.
- Make no charge for making a request for personal information, correcting the information or associating a statement regarding accuracy with the personal information.

Storage

Groomed to Go Inc. will:

- Implement and maintain steps to ensure that personal information is protected from misuse and loss, unauthorised access, interference, unauthorised modification or disclosure.
- Before disclosure of any personal information to an overseas recipient, including a provider of IT services such as servers or cloud services, establish that they are privacy compliant. Groomed to Go Inc. will have systems that provide sufficient security.
- Ensure that Groomed to Go's data is up to date, accurate and complete.

Destruction and de-identification

Groomed to Go Inc. will:

- Destroy personal information once is not required to be kept for the purpose for which it was collected, including from decommissioned laptops and mobile phones.
- Change information to a pseudonym or treat it anonymously if required by the person whose information Groomed to Go Inc. holds and will not use any government related identifiers unless they are reasonably necessary for our functions.

Data Quality

Groomed to Go Inc. will:

- Take reasonable steps to ensure the information collected is accurate, complete, up to date, and relevant to the functions we perform.

Data Security and Retention

Groomed to Go Inc. will:

- Only destroy records in accordance with the organisation's Records Management Policy.

Openness

Groomed to Go Inc. will:

- Ensure stakeholders are aware of Groomed to Go Inc.'s Privacy Policy and its purposes.
- Make this information freely available in relevant publications and on the organisation's website.

Access and Correction

Groomed to Go Inc. will:

- Ensure individuals have a right to seek access to information held about them and to correct it if it is inaccurate, incomplete, misleading or not up to date.

Anonymity

Groomed to Go Inc. will:

- Allow people from whom the personal information is being collected to not identify themselves or use a pseudonym unless it is not practical to deal with them on this basis.

Making information available to other organisations

Groomed to Go Inc. can:

- Release information to third parties where it is requested by the person concerned.

Related Documents

- Records Management Policy
- [Confidentiality Policy](#)
- [Employment References Policy](#)

Authorisation

Sandy Gregory

29/04/2020

PRIVACY POLICY – FOR EXTERNAL USE/PRIVACY ACT COMPLIANCE

Your privacy is important

This statement outlines Groomed to Go Inc.'s policy on how it uses and manages personal information provided to or collected by it.

Groomed to Go Inc. is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act and is compliant with the Privacy Amendment (Enhancing Privacy Protection) Act 2012. [OPTION: In relation to health records, Groomed to Go Inc. is also bound by the Victorian Health Privacy Principles which are contained in the Health Records Act 2001].

Groomed to Go Inc. may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to Groomed to Go Inc.'s operations and practices, and to make sure it remains appropriate to the changing legal environment.

What kind of personal information does Groomed to Go Inc. collect and how does Groomed to Go Inc. collect it?

The type of information Groomed to Go Inc. collects and holds includes (but is not limited to) personal information, including sensitive information, about:

- Your name, age group, gender, email and contact phone number
- Your clothing size and shoe size
- The number and type of articles of clothing you have received as part of our service
- Your feedback on our services
- Your attendance at workshops and styling services provide by Groomed to Go Inc. and partners
- Your Job Active Provider or Community Service agency and relevant contact details.

Personal Information you provide:

Groomed to Go Inc. will generally collect personal information held about an individual by way of booking forms, phone calls and volunteered information at appointments, including draft resumes and style questionnaires. You do have the right to seek to deal with us anonymously or using a pseudonym, but in almost every circumstance it will not be practicable for us to deal with you or provide any services to you except for the most general responses to general enquiries, unless you identify yourself.

Personal Information provided by other people:

In some circumstances Groomed to Go Inc. may be provided with personal information about an individual from a third party, for example a Job Active or Community Service Provider.

In relation to employee records:

Under the Privacy Act, the Australian Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to Groomed to Go Inc.'s treatment of an employee record, where the treatment is directly related to a current or former employment relationship between Groomed to Go Inc. and employee. However, Groomed to Go Inc. must provide access and ensure compliance with the Health Privacy Principles under the Victorian Health Records Act 2001.

How will Groomed to Go Inc. use the personal information you provide?

Groomed to Go Inc. will use personal information it collects from you for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected, or to which you have consented.

In relation to direct marketing, Groomed to Go Inc. will use your personal information for direct marketing where you have provided that information, and you are likely to expect direct marketing: only then you will be sent direct marketing containing an opt out. If we use your personal information obtained from elsewhere, we will still send you direct marketing information where you have consented and which will also contain an opt out. We will always obtain your consent to use sensitive information as the basis for any of our direct marketing.

We may use video surveillance for security purposes and the footage will be used only by Groomed to Go Inc. and by the providers of our security services for security purposes. Surveillance videos are not used by Groomed to Go Inc. for other purposes and the footage is not publicly available. Surveillance cameras are not located in any bathrooms or change room facilities.

Job applicants, staff members and contractors:

In relation to personal information of job applicants, staff members and contractors, Groomed to Go Inc.'s primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.

The purposes for which Groomed to Go Inc. uses personal information of job applicants, staff members and contractors include:

- for insurance purposes
- to satisfy Groomed to Go Inc.'s legal obligations.

Where Groomed to Go Inc. receives unsolicited job applications, these will usually be dealt with in accordance with the unsolicited personal information requirements of the Privacy Act.

Volunteers:

Groomed to Go Inc. also obtains personal information about volunteers who assist in its functions or conduct associated activities, such as to enable Groomed to Go Inc. and the volunteers to work together.

Marketing and fundraising:

Groomed to Go Inc. treats marketing and seeking donations for future growth and development of as important. Personal information held by Groomed to Go Inc. may be disclosed to an organisation or agent that assists in Groomed to Go Inc.'s fundraising.

Who might Groomed to Go Inc. disclose personal information to?

Groomed to Go Inc. may disclose personal information, including sensitive information, held about an individual to:

- government departments
- anyone you authorise Groomed to Go Inc. to disclose information to.

Sending information overseas:

Groomed to Go Inc. will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases this consent will be implied); or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

We do use overseas providers of IT services including servers and cloud services.

How does Groomed to Go Inc. treat sensitive information?

In referring to 'sensitive information', Groomed to Go Inc. means:

'Information relating to a person's racial ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences or criminal record, that is also personal information; and health information about an individual'.

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

Management and security of personal information

Groomed to Go Inc.'s staff are required to respect the confidentiality of personal information and the privacy of individuals.

Groomed to Go Inc. has in place steps to protect the personal information it holds from misuse, loss, unauthorised access, modification, interference or disclosure by use of various methods including locked storage of paper records and passworded access rights to computerised records.

When you use our websites, having your cookies enabled will allow us to maintain the continuity of your browsing session. We may also use web beacons, Flash local stored objects and JavaScript. If you adjust your browser settings to block, reject or delete these functions, the webpage may not function in an optimal manner. We may also collect information about your IP address, although this may not identify you.

Updating personal information

Groomed to Go Inc. endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. A person may seek to update their personal information held by Groomed to Go Inc. by contacting the Privacy Officer of Groomed to Go Inc. at any time.

The Australian Privacy Principles and the Health Privacy Principles require Groomed to Go Inc. not to store personal information longer than necessary. In particular, the Health Privacy Principles impose certain obligations about the length of time health records must be stored.

You have the right to check what personal information Groomed to Go Inc. holds about you.

Under the Commonwealth Privacy Act and the Health Records Act, an individual has the right to obtain access to any personal information which Groomed to Go Inc. holds about them and to advise Groomed to Go Inc. of any perceived inaccuracy. There are some exceptions to this right set out in the applicable legislation. To make a request to access any information Groomed to Go Inc. holds about you, please contact the Privacy Officer in writing.

Groomed to Go Inc. may require you to verify your identity and specify what information you require. Although no fee will be charged for accessing your personal information or making a correction, Groomed to Go Inc. may charge a fee to retrieve and copy any material if the information sought is extensive. Groomed to Go Inc. will advise the likely cost in advance.

How long will Groomed to Go Inc. keep my information?

Under our destruction and de-identification policies, your personal information that is no longer required will be de-identified or destroyed. In many circumstances, however, it will be kept for marketing purposes, as you will have consented to that in writing with us.

Enquiries and privacy complaints

If you would like further information about the way Groomed to Go Inc. manages the personal information it holds, please contact the Privacy Officer. If you have any concerns, complaints or you think there has been a breach of privacy, then also please contact the Privacy Officer who will first deal with you usually over the phone. If we then have not dealt satisfactorily with your concerns, we will meet with you to discuss further. If you are not satisfied with our response to your complaint within 30 days from this meeting, then you can refer your complaint to the Office of the Australian Information Commissioner via:

- email: enquiries@oaic.gov.au
- tel: 1300 363 992
- fax: +61 2 9284 9666