

1. Policy Statement

This Privacy Policy ('Policy') governs the collection, use and disclosure of personal information by the Animal Welfare League South Australia Inc. (AWL).

This Policy outlines how AWL manages personal information including in accordance with the Australian Privacy Act 1988 (Cth) and Australian Privacy Principles (Privacy Laws).

In this Policy, personal information means any information or opinion about an identified individual or an individual who is reasonably identifiable, whether true or not. It does not include information that is de-identified.

2. Application

This Policy applies if you:

- are one of AWL's customers, donors, supporters, contractors/sub-contractors or suppliers;
- use any of AWL's products and services;
- visit AWL's website or any AWL affiliated websites (Sites) or any AWL social media channels or subscribe to AWL's mailing lists (Channels);
- are employed by AWL or seeking employment with AWL; or
- volunteer with AWL or seeking volunteer work with AWL.

(Referred to as you and your).

By providing AWL with your personal information, you authorise the personal information being collected, held, used and disclosed in accordance with this Policy. This Policy is in addition to any other applicable terms and conditions that may apply to your relationship and/or engagement with AWL.

3. Policy Detail

3.1 Collection of information

3.1.1 *Who AWL collects information from*

AWL may collect and hold personal information about:

- Current, potential and former customers, volunteers, donors and supporters.
- Current, potential and former service providers, suppliers and their employees and contractors/sub-contractors.
- Current and prospective employees and contractors of AWL and their next-of-kin or emergency contacts.
- Other individuals AWL deals with, in the course of carrying out business.

3.1.2 *What information AWL collects*

AWL collects a range of personal information to manage and conduct different aspects of the business, and to provide and market our products and services, and to meet our legal obligations. Depending upon the nature of your relationship with AWL the type of personal information collected and held may include:

General: Information as required for AWL's relationship with you, such as:

- your basic contact information (e.g. name, address, contact details, date of birth, and other personal details);
- information to verify your identity;
- your payment information, when you enter into a transaction with AWL;
- details of the products and services AWL has provided to you, or that you have enquired about including any additional information necessary to deliver those products and services and respond to your enquiries;
- records of our communications or dealings with you, including any complaints, incidents requests or queries;
- information that you post to AWL Sites or Channels;
- when you access AWL products or services, or AWL Sites or Channels information may be collected that is sent to AWL by your computer, mobile device or other access device, including – your device ID, device type, IP address, geo-location, computer and connection information, referral URL, statistics on page views, traffic to and from AWL products, services, Sites and Channels;
- CCTV footage from any of AWL's premises; and
- any other personal information that may be required to facilitate your dealings with AWL and/or to assist AWL in conducting our business, providing and marketing our services and meeting our legal obligations.

For prospective, current or past employees, volunteers, suppliers and contractors: Information for the purpose of commencing and conducting a business or employment relationship with you. This may include (as applicable):

- your financial information (e.g., bank account details or payment history for invoicing and/or payroll purposes);
- your government identifiers (e.g., tax file number, driver's licence, passport and/or visa details);
- information about your occupation, employment history, education and suitability for the position or relationship, including criminal history, social media profiles and whether you hold any licences/permits or police clearances required for the position;
- details about engagement by AWL, including the type of products and/or services you provide to AWL, and other information relating to your performance;
- name and details of emergency contacts;
- your health and medical information, including medical history and contact details for your medical practitioners and treatment providers;
- diversity information, which might include gender, ethnicity, languages spoken, relationship status etc;
- information about your past or current performance in the position or relationship; and
- CCTV footage from any of AWL's premises.

For health and safety and/or COVID-19 or other diseases: Information for the purpose of health and safety compliance and/or complying with COVID-19 or any other applicable guidelines set down by the Australian Government, Australian State and Territory Governments or any other relevant body and to enable AWL to make informed health and safety decisions. This may include:

- vaccination status and proof of vaccination;
- biometric information including temperature checks;
- recent personal health history including details regarding communicable diseases;
- recent overseas or interstate travel, contact with any person(s) who have travelled overseas in the preceding 14 days, have tested positive for COVID-19 or are awaiting test results, or are experiencing any COVID-19 symptoms; and
- any other applicable requirement as determined at the time.

3.1.3 How AWL collects personal information

AWL uses different methods to collect your personal information, depending on your dealings and relationship with the organisation. AWL will generally collect personal information directly from you (e.g., in person, by telephone or through written information or forms that you submit by email, in person or through our Sites, and Channels). However, AWL may also collect personal information:

- from you indirectly (including through the use of our Sites and Channels);
- from current, potential and former service providers, suppliers and their employees, whom AWL deal with in the course of carrying out our operations;
- from third parties in some instances, such as a medical professional or an employment reference, or suppliers of services to AWL;
- from CCTV cameras that may be placed on and around AWL premises; and
- from publicly available websites or sources.

If you have provided AWL with information about another person, you warrant that you have that person's permission to do so. Your obligations under Privacy Laws may also mean that you need to tell that person about the disclosure and let them know that they have a right to access their personal information and that AWL will handle their personal information in accordance with this Policy.

3.2 Non-disclosure of personal information

You are not required to provide AWL with your personal information. However, in some cases, if personal information AWL requests is not provided, it may limit or affect the organisation's ability to engage with you, including that:

- AWL may be unable to supply the relevant product or service or to perform our obligations to you;
- if you are an applicant for an employment, contractor or volunteer position, AWL may not be able to process your application for a position or engagement.

3.3 How AWL uses personal information

In general, AWL collects, holds, uses and discloses personal information for the following purposes:

- to verify your identity and communicate with you;
- to provide and market our products and services to you;
- to help AWL operate, protect, manage, improve, conduct and develop the business (including products and services), and AWL users' experience, for example, by performing analytics and conducting research;
- to maintain and administer your records, including (where relevant) your employee records;
- to process, administer, collect payments from or make payments to you, and if applicable, make appropriate taxation deductions;
- to assess suitability of potential employees, volunteers or contractors;
- to assess performance of current employees, volunteers or contractors;
- to ensure health and safety on AWL premises;
- to respond to any feedback, queries or complaints;
- to provide joint marketing initiatives with other service providers;
- to perform data analysis and/or market research;
- to comply with our legal obligations, including our reporting obligations; and
- as otherwise may be required for the general management and conduct of our business.

In addition, CCTV footage specifically may be used for the following purposes:

- detecting and deterring unauthorised access to, and criminal behaviour on, our premises;
- monitoring the safety and security of our customers, employees, contractors, volunteers and suppliers, and completing incident investigations; and

- reviewing the actions of our employees, volunteers and contractors, including in any incident investigations and disciplinary matters.

3.4 AWL's disclosure of personal information

AWL may disclose your personal information for the purpose for which it was collected (or a related secondary purpose) and otherwise where permitted or required by law or with your consent.

Some of the recipients AWL may disclose your personal information to include third party service providers who help to deliver AWL products and services and to conduct AWL business. These third parties provide a variety of services, including professional advisory, marketing and advertising, recruitment, insurance, claims management, data analysis, business intelligence, website and technology services. Each of these third parties are carefully selected and are only permitted to use your personal information to the extent necessary for them to provide their services to AWL.

3.5 Offshore disclosure

As at the date of this Policy, AWL generally discloses personal information to third parties located in Australia.

However, from time to time AWL may engage an overseas recipient to provide services to the organisation, such as cloud-based storage solutions. Please note that the use of overseas service providers to store personal information will not always involve a disclosure of personal information. However, by providing AWL with your personal information, you consent to the storage of such information on overseas servers and acknowledge that APP 8.1 will not apply to such disclosure. For the avoidance of doubt, in the event that an overseas recipient breaches the APPs, that entity will not be bound by, and you will not be able seek redress under, the Privacy Act.

3.6 Security of your personal information

AWL takes reasonable steps to protect personal information held by the organisation from misuse and loss and from unauthorised access, modification or disclosure, for example through the use of technical and physical security measures, including restricting access to electronic records through technical access restrictions.

3.7 Access, correction and retention of your personal information

3.7.1 Access

You are entitled to access the personal information AWL holds about you and may do so by contacting People, Culture and Safety (details provided below). AWL will comply with obligations under the Privacy Laws, noting that AWL may need to verify your identity before access to your personal information is allowed, and are permitted to withhold the disclosure of personal information in prescribed circumstances.

3.7.2 Correction

If you believe the personal information, AWL holds about you is inaccurate, incomplete or out of date, please contact People, Culture and Safety (details provided below). If you satisfy AWL that any personal information held about you is not accurate, complete or up to date, AWL will amend records accordingly.

3.7.3 Retention

AWL will retain your personal information for as long as required to fulfil the purpose for which it was collected, unless a longer retention period is required for the purpose of discharging our legal, accounting and reporting requirements.

If AWL no longer requires your personal information, and is not permitted or required by law to keep it, AWL will take reasonable steps to destroy or de-identify that information. The steps may vary depending on the nature of that information, the way it was collected, and how it is stored.

3.8 Marketing and opting out

If you consent to receiving direct marketing communications from AWL, use of your personal information may be used to contact you from time to time whether by email, phone or SMS, to identify a product or service that you may be interested in or to tell you about new products or services, special offers, promotions and events.

If you do not want AWL to contact you for these purposes, you can withdraw your consent and let AWL know at any time by unsubscribing from the mailing list by clicking on the link in the marketing communication or contacting AWL at (08) 8348 1300.

3.9 Cookies and links to other sites

To improve AWL Sites and advertising, and to assist AWL in understanding browsing behaviour when you use our Sites, AWL may use website measurement software and other analytics tools and services (including Google Analytics) to gather information such as traffic patterns, mouse click activity, IP addresses, and any other information you may provide through use of AWL Sites. AWL may also use analytics tools available on our Channels. This information is aggregated and anonymised so that you cannot be identified.

Like many other websites on the internet, AWL may use 'cookies' to store and track information about you when you are on Sites or Channels. A cookie is a data file that is sent to your browser from a web server and stored on your computer (or other device), then sent back to the server by your browser each time you access certain sections of our Site or Channels.

This information helps AWL to remember your preferences and can assist to provide a tailored experience and customised content and material on AWL Sites and Channels. This information may be retained in an anonymous or aggregated form after AWL have erased personal information that identifies you from our systems.

You can choose to disable cookies via your device's website browser settings. However, if you choose to reject cookies, you may not be able to use or access some features of the services that AWL offer.

AWL may provide links or references to other websites from our Sites or Channels. This Policy does not apply to those websites, and AWL takes no responsibility for any information collected by such third parties.

3.10 Changes to this policy

This Policy is current as of February 2023. AWL may amend and update this Policy from time to time to take account of new laws and technology, changes to our operations and practices and the changing business environment.

AWL will provide you with reasonable notice before a change is implemented by posting a statement on AWL's website, or an announcement may also be made by email (if we have your email address). The date of this Policy will otherwise inform you as to whether there have been updates since your last visit.

By continuing to use AWL products, services, websites or Channels, or otherwise continuing to deal with AWL, you accept these changes and this Policy as it applies from time to time. However, if you do not agree to an amendment, you can notify People, Culture and Safety at the contact details set out below or discontinue your use of our Sites or Channels.

3.11 How to contact AWL and complaints

If you have any questions about personal information and how AWL has managed your personal information, please contact AWL using the following contact details:

By post: Animal Welfare League of South Australia Inc.
Attention: People, Culture and Safety Department
1-19 Cormack Road
WINGFIELD SA 5013

By email: PeopleCultureandSafety@awl.org.au

By phone: (08) 8348 1300

For further information about making a privacy complaint, or the progress or outcome of any investigation, please contact People, Culture and Safety using the details above.

If you are not satisfied with how AWL has handled your complaint, you can contact the Office of the Australian Information Commissioner at: GPO Box 5218, Sydney NSW 2001 or by email to enquiries@oaic.gov.au.

4. Related Legislation

- Fair Work Act 2009 (Cth)
- Spam Act 2003 (Cth)
- Privacy Act 1988 (Cth)
- Australian Privacy Principles (Privacy Laws)

5. Associated Documents

Identifier	Title
POL07	Confidentiality Policy
POL51	Code of Conduct

6. Authorisation

This document was formally endorsed as follows:

Policy Identifier: POL05 Privacy Policy

Policy Owner: Animal Welfare League of South Australia Inc. Board



Authorised: Katherine Bartolo, AWL Chair

Date: 28 February 2023

Review Date: 28 February 2026