

Policy number	77	Version	4
Approved by Board on	15 August 2019	Scheduled review date	August 2022

## 1. Purpose

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

## 2. Scope

The policy is relevant to the whole of the NIODA organisation

## 3. Policy Statement

NIODA collects and administers a range of personal information to enable the efficient and effective operations of the organisation. In compliance with the Privacy and Data Protection Act 2014 (Vic) and the Privacy Act 1988, the organisation is committed to protecting the privacy of personal information it collects, holds and administers.

NIODA 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.

NIODA 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.

NIODA will:

- Collect only information which the organisation requires for its primary function;
- Ensure that stakeholders are informed as to why information is collected and how the information gathered is administered;
- Use and disclose personal information only for NIODA's 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.

## 4. Responsibilities

NIODA's Board of Governance is responsible for developing, adopting and reviewing this policy.

NIODA's Chief Executive Officer 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.

## 5. Processes

### 5.1 Collection

NIODA will:

- only collect information that is necessary for the performance and primary function of NIODA
- notify stakeholders about why information is collected and how it is administered
- notify stakeholders that this information is accessible to them.

### 5.2 Use and Disclosure

NIODA will:

- only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose; and
- for other uses, NIODA will obtain consent from the affected person.

### 5.3 Data Quality

NIODA will:

- take reasonable steps to ensure the information the organisation collects is accurate, complete, up to date, and relevant to the functions we perform.

### 5.4 Data Security and Retention

NIODA will:

- safeguard the information we collect and store against misuse, loss, unauthorised access and modification
- only destroy records in accordance with the organisation's Records Management and Security Policy.

### 5.5 Openness

NIODA will:

- ensure stakeholders are aware of NIODA's Privacy Policy and its purposes
- make this information freely available in relevant publications and on the organisation's website

### 5.6 Access and Correction

NIODA will:

- ensure compliant opt-in and unsubscribe are features of all mailing list communications
- 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.

### 5.7 Anonymity

NIODA will:

- give stakeholders the option of not identifying themselves when completing evaluation forms or opinion surveys.

### 5.8 Making information available to other organisations

NIODA will:

- only release personal information about a person with that person's express permission. For personal information to be released, the person concerned must sign a release form
- release information to third parties where it is requested by the person concerned.

## 6. NIODA website

### 6.1 Log information (browsing)

When you use NIODA's online services, the servers automatically record information that your browser sends whenever you visit a website. These server logs may include information such as your server address, your top-level domain name (for example, .com, .gov, .au, .uk, etc.), the date and time of the visit to the site, the pages accessed and documents viewed, the previous sites visited, the browser type, the browser language, and one or more cookies that may uniquely identify your browser.

No attempt is made to identify you through your browsing other than in exceptional circumstances, such as an investigation into the improper use of the website.

### 6.2 Cookies

A cookie is a small file containing a string of characters to your computer that uniquely identifies your browser. It is information that your web browser sends back to our website server whenever you visit it again.

NIODA use cookies to 'remember' your browser between page visits. In this situation, the cookie identifies your browser, not you personally. No personal information is stored within these cookies.

### 6.3 Google Analytics

NIODA uses Google Analytics to collect information about visitors to our website. Google Analytics uses first-party cookies and JavaScript code to help analyse how users use the site. It anonymously tracks how visitors interact with this website, including how they have accessed the site (for example from a search engine, a link, an advertisement) and what they did on the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purposes of compiling reports on website activity and providing other services relating to website activity and internet usage. Google Analytics Demographics and Interest Reporting is enabled. Demographic and interest reports may be generated including identifiers such as your age, gender, affinity categories (for example education and training interests), in-market segments and other categories based on acquisition, behaviour, and conversions metrics. These reports may be used by NIODA to assist in making policy and programme decisions. You can prevent your information from being collected by Google Analytics by refusing the use of cookies by selecting the appropriate settings on your browser or by installing the Google Analytics Opt-out Browser Add-on.

### 6.4 Links to External Websites

NIODA's website includes links to other websites. NIODA is not responsible for the content and privacy practices of other websites. NIODA recommends that you examine each website's privacy policy separately.

## 7. Electronic communication

There are inherent risks associated with the transmission of information over the internet, including via email. You should be aware of this when sending personal information to us via email or via our website or social media platforms. If this is of concern to you then you may use other methods of communication with us, such as post, fax or telephone (although these also have risks associated with them).

NIODA records your name and email address when you send a message to us or subscribe to one of our mailing lists. Any personal information, including email addresses, will only be used or disclosed for the purpose for which it was provided.

**8. Accidental or unauthorised disclosure of personal information**

NIODA will take seriously and deal promptly with any accidental or unauthorised disclosure of personal information.

**9. Grievances**

If you are not satisfied with our response complaints can be made as per the NIODA Grievance Policy. The policy is published on the NIODA website <https://www.nioda.org.au/policies>.

**10. Publication**

This policy is publicly available on the NIODA website <https://www.nioda.org.au/policies>.

**11. Related documents**

Privacy and Data Protection Act 2014 (Vic)

Privacy Act 1988

Fair Work Act 2009 (C'th)

Records Management & Security Policy

Grievance Policy