

Scouts SA Privacy Policy

Policy Title	Scouts SA Privacy Policy		
Responsible Department	Governance, Risk and IT		
Endorsed By	CEO	Date	August 2024
Approved By	Board	Date	August 2024
Review Schedule	Every two years		

Applicable Legislation	Privacy Act 1988 (Cth)
Related Policies	Scouts SA Privacy Framework

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Scouts SA Privacy Policy

1 PURPOSE

The purpose of this policy is to outline the collection, use, storage and disclosure of personal information about members and customers.

2 SCOPE

This Policy applies to Scouts SA in all its functions, activities and operations.

3 POLICY STATEMENT

Your privacy is important to us.

The Scout Association of Australia, South Australian Branch Incorporated (ABN 35 621 021 366) is committed to protecting the privacy of individuals, including members and customers. Scouts SA abides by the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cth). The APPs regulate the way certain entities handle personal information. We are also bound by the Australian Direct Marketing Association Code of Practice for direct mail activities.

Privacy of your personal information is important to us and we conduct our business with the highest standards of personal and corporate integrity. We aim to provide the best possible service, while ensuring you are aware of how your personal information is used within Scouts SA.

By providing your personal information to us, you agree to our collection, use and disclosure of your personal information (including sensitive information such as health information) in accordance with this Privacy Policy.

4 PRINCIPLES

4.1 What is personal information?

Personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable: (a) whether the information or opinion is true or not; and (b) whether the information or opinion is recorded in a material form or not.

4.2 What personal information do we collect and hold?

Scouts SA will always be open and honest in our dealings with you and will only collect information about you that we believe is necessary to undertake our legitimate business activities. The nature of the personal information we collect will be dependent upon your chosen level of interaction with Scouts SA, and the degree to which you utilise the broad range of Scouts SA benefits, products and services.

Personal information is any information about an individual who can be reasonably identified from that information, such as a person's name, gender, address, date of birth, and telephone and email contact details. Further specific details may be required for different types of transactions and membership interactions (i.e. attendance at events/activities that require medical/contact information).

Scouts SA also retains transactional histories of your usage of Scouts SA services for audit purposes and to assist in understanding your circumstances, preferences and service needs.

For employment applications, we collect your name, address, contact details, current and past employment information, educational qualifications and professional associations. We also collect information about and proof of your residency status, the name and contact details of your referees and other information required for recruitment purposes. Where we seek your consent to conduct a background check, we also collect details of your proof of identity from you.

4.3 How do we hold your personal information?

We may hold your personal information in a number of ways, including:

- on our IT systems and databases, which may include storing your data on a third-party supplier's system
- in hard copies (paper files).

We may combine personal information we receive about you with other information we hold about you. This includes information collected for different products and services.

We may hold your personal information if we need it for any purpose for which we may use or disclose it, or for longer if required by law.

4.4 Why is the information collected and how is it used?

Generally, we collect personal information necessary to validate your identity and to ensure your request or enquiry can be actioned efficiently and effectively. Collection of personal information is necessary to undertake many of the broad range of transactions offered by Scouts SA, including:

- to process an application for Scouts SA Membership
- to process an application or renewal for Exurbia Membership
- to process a request for another Scouts SA product or service
- to register you to attend events or activities conducted by Scouts SA or a third-party provider
- to respond to any query sent to us by you
- to handle complaints and disputes
- to use in accordance with any other purpose which is stated to you at the time of collection or that you otherwise authorise
- to detect, investigate and prevent fraud
- to train our employees
- to assess and process employment applications
- to satisfy legal requirements
- to ensure operational safety and efficiency.

4.5 How do we collect your personal information?

In most cases, we only collect information about you directly from you either in person, in writing, email, through our online services and by telephone. However, there are circumstances where this is impractical such as a parent providing information on behalf of a youth member. In some circumstances, we may also collect your personal information from:

- third parties who you have asked to provide your personal information to us, including your referees
- our agents and service providers
- people who are involved in a claim or assist us in assessing, investigating, processing or settling claims, including third parties claiming under your policy, witnesses, external claims data collectors and verifiers, and your employer
- law enforcement, dispute resolution, statutory and regulatory bodies
- industry databases

- publicly available sources such as the internet and telephone directories
- the general public when it is unsolicited and may be relevant to a particular policy or fraud investigation.

Unless we are required or permitted by law to collect sensitive information about you, we will only do so after obtaining your consent.

If you provide personal information about a third-party individual to us you need to ensure that the individual is aware of, understands and agrees to the collection, use and disclosure of his or her personal information in accordance with this Privacy Policy.

4.6 What if you don't want to provide certain personal information?

Scouts SA only collects information that we believe is necessary to undertake a specific transaction or function. Therefore, refusal to supply requested details may delay or prevent us from satisfying your request, be it a Member application, or application for one of our other services.

Scouts SA will generally require information about an individual to deliver a service, however, anonymity may be allowed where appropriate. Individuals may be identified by using unique identifiers if doing so improves the efficiency of the Scouts SA function. Services may be provided anonymously, where lawful and practicable.

4.7 Disclosure of personal information

Any personal information collected, held or used by Scouts SA is kept strictly confidential and is only accessed by authorised Scouts SA staff, agents, contractors or service providers in the course of them undertaking their legitimate duties in providing a given product or service and managing our business. Only information necessary for the particular function is shared with the relevant service provider.

Member or customer information will not be given, rented, sold or traded to any external third party organisation and will only be made available to a third party:

- where Scouts SA has contracted an external service provider to assist in the execution of Scouts SA's legitimate activities, including IT service providers, providers of consultancy services and professional advisors
- if disclosure is required by or authorised by law or
- if you consent to the disclosure of specific information to third parties.

4.8 Disclosure of personal information overseas

Scouts SA may need to disclose your personal information to other companies, service providers and/or reinsurers, including related entities which may be located overseas. The countries in which these recipients may be located will vary from time to time, but may include the United Kingdom, United States of America and other countries from which entities provide services for Scouts SA.

When disclosing your personal information to overseas recipients, we take all measures that are reasonable in the circumstances to ensure your personal information is treated in accordance with the APPs.

Any information disclosed to an overseas recipient may only be used for the purposes intended.

4.9 How we protect your personal information

Reasonable steps are taken by us to protect personal information we hold from misuse, interference, loss, unauthorised access, modification or disclosure.

5 CONTACTS AND COMPLAINTS PROCEDURE

5.1 Contacting Scouts SA about access to and/or correction of your personal information

Scouts SA aims to ensure the personal information it collects, uses and discloses, including the personal information of its members and customers, is accurate, up to date, complete and relevant.

If you would like to access your personal information or feel that the information we currently have on record is inaccurate, irrelevant, out of date of incomplete, please contact us on <u>hq@sa.scouts.com.au</u>. We will need to verify your identity before giving you access. We will normally be able to deal with your request immediately. If the request is complex, we will ask you to complete a Personal Information Access & Disclosure request form.

We will comply with any such request except where the Privacy Act 1988 or Australian Privacy Principles allow us to refuse to do so. There is no fee for making such a request, but we may charge for actually providing you access. We will endeavour to respond to such a request within 10 working days.

5.2 Marketing and promotional offers

From time to time, Scouts SA may contact you with some direct offers that may be of interest to you; however, Scouts SA honours any request not to receive unsolicited, personally targeted promotional material.

If you do not wish to receive such offers, you can opt out directly via the unsubscribe link on any electronic communications, by phone 08 7134 1200 or by emailing us at <u>hq@sa.scouts.com.au</u>

5.3 Comments and complaints regarding Privacy

If you have a problem with how Scouts SA has used your personal information or are concerned about any aspects of the Scouts SA's Privacy Policy, we want to hear from you.

The Scouts SA Privacy Officer has the appropriate knowledge and authority to deal with any privacy matter and will be able to explain your rights and any referral that may be necessary in order to resolve the matter. Any formal privacy complaint will be dealt with by the Privacy Officer, or if necessary, may be referred to the CEO, who has the appropriate authority to deal with disputes.

Privacy-related comments and complaints may be lodged over the phone or online. Our contact details are as follows:

Telephone - 08 7134 1200 (9am–5pm ACST weekdays)

Mail - Scouts SA Privacy Officer, Scouts SA, 83 Greenhill Rd Wayville SA 5034

Email – privacy@sa.scouts.com.au

The matter will be investigated, and a response will be provided promptly. Any formal dispute review will be undertaken promptly, and the Internal Committee's decision will be provided within fifteen (15) working days. Every effort will be made to equitably address privacy concerns.

In the unlikely event that your complaint is unresolved, you are unhappy with the resolution of your complaint or with the way Scouts SA has handled your complaint through the Dispute Resolution Process, you are entitled to contact the Office of the Australian Information Commissioner which may investigate your complaint further. However, they will only become involved when all internal avenues have been exhausted. Their contact details are as follows:

Office of the Australian Information Commissioner GPO Box 5218 Sydney NSW 2001 Phone: 1300 363 992 <u>www.oaic.gov.au</u>

6 ROLES AND RESPONSIBILITIES

Board	Responsible for establishing the governance accountabilities for the Privacy and security of data held by Scouts SA.	
Privacy Officer	 Responsible for: 1. Overseeing security of data and information held by Scouts SA 2. Provision of guidelines to support the implementation of the policy 3. Monitoring and reviewing this Policy. 	
Management and Leaders	Responsible for ensuring that this Policy and its subordinate documents are effectively communicated and implemented throughout all areas of their control.	
Volunteers and Employees	Responsible for familiarising themselves with this Policy and its subordinate procedures and adhering to its principles and requirements.	

DEFINITIONS TABLE

Board	The governing body responsible for overall corporate governance of Scouts SA.
Employee/s	All paid permanent and contracted full-time, part-time, temporary and/or casual persons, including but not limited to; managers, supervisors, interns, apprentices, contractors and student trainees.
Scouts SA	The abbreviation for The Scout Association of Australia, South Australian Branch Incorporated and includes reference to all other trading and business names associated with Scouts SA.
Volunteer/s	All volunteers, active members, adult helpers and other unpaid roles, who are associated with activities for Scouts SA.