



**Cancer  
Council**  
WA

# **PRIVACY POLICY**

## 1. OUR COMMITMENT TO PRIVACY

Cancer Council Western Australia (“we”, “us”, “our”) takes your privacy seriously. We are committed to respecting the rights of all individuals, including their expectations of privacy, and have a dedicated working group monitoring our compliance and improvement process.

We are bound by the Australian Privacy Principles (APPs) under the Privacy Act 1988. This policy has been written in compliance with the APPs and Privacy Act and summarises how we handle your personal information.

Key points of our Privacy Policy:

- We collect personal information from people who are connected to our operations and activities.
- We only collect personal information when it is required for general business purposes and we only collect it by lawful means and not in an unreasonably intrusive way.
- We take all reasonable steps to protect all of the personal information that we hold from misuse, interference and loss, and from unauthorised access, modification or disclosure.
- We will never share your personal information with a third party (including other charitable organisations) for their own direct marketing purposes.
- You can opt out of receiving direct marketing from us, update your information or make a complaint at any time by contacting [privacy@cancerwa.asn.au](mailto:privacy@cancerwa.asn.au)
- We may revise this Privacy Policy from time to time by updating this page. The revised Privacy Policy will take effect when it is posted on our website.

## 2. WHAT IS PERSONAL INFORMATION?

**2.1** Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not.

**2.2** The types of personal information we collect include; your name, date of birth, gender, contact information, credit/debit card information, health information and other information about your history with, or relationship to cancer.

### 3. WHOSE PERSONAL INFORMATION DO WE COLLECT?

- 3.1** We collect personal information from people who are connected to our operations and activities, including;
- Employees, donors, fundraisers, people who purchase products from us, recipients of support services, participants in advocacy campaigns, participants in health promotion projects, health professionals, people who attend our education or fundraising events, research grant applicants, suppliers, volunteers and service providers.

### 4. HOW DO WE COLLECT AND HOLD PERSONAL INFORMATION?

- 4.1** We only collect personal information by lawful means and not in an unreasonably intrusive way.
- 4.2** In most cases, we collect personal information directly from you. This may be in person (for example, where you purchase a retail product in-store or attend an event), on the telephone (for example, if you contact our 13 11 20 Cancer Information and Support Service), or online (for example, if you register for an event on our website).
- 4.3** We may also collect personal information through publications, such as newspapers, magazines and journals, and written correspondence, such as emails, mail and SMS that you send us - for example, when you ask us to update your contact details.
- 4.4** From time to time, in order to provide our services we may collect personal information from third parties including, health and support service providers, fundraisers, event partners, families and friends.
- 4.5** We will only collect personal information from third parties if:
- we are required or authorised by or under an Australian law, or a court/tribunal order, to collect the information from someone other than the individual concerned; or
  - it is unreasonable or impracticable to collect the information directly from the individual concerned; or
  - it is provided to us, in the course of us providing at least one of our functions and activities.

## 5. WHY DO WE COLLECT PERSONAL INFORMATION?

**5.1** We collect your personal information for a number of purposes, including:

- **Administration:** to process your donation or registration and provide you with goods or services requested
- **Quality control:** to ensure our information and services reach the people who need them, to improve and evaluate our programs and services, and to ensure the accuracy of our records
- **Marketing:** to communicate with you about Cancer Council WA products, services, campaigns, causes and events
- **Support services:** to provide you with information and support services, and to evaluate and report on these services
- **Health promotion:** to provide you with information about cancer risk factors, through our cancer prevention campaigns like SunSmart, Crunch&Sip, Make Smoking History, LiveLighter and Find Cancer Early
- **Volunteering and other support:** to enable you to assist us with volunteering, community fundraising, advocacy and other activities where we seek the community's assistance
- **Recruitment:** when you apply for job with us, we collect your information to enable us to select and appoint the best people available for positions
- **Other purposes:** communicating with you in relation to our operations, activities and objectives, to verify your identity and to comply with relevant laws

**5.2** Any time we collect your personal information, we will provide you with a collection statement (or a link to our collection statement) outlining why we are collecting the information, how it will be used and stored, how you can access this Privacy Policy and any consequences that may arise from you not providing that information.

View our Collection Statement. <https://www.cancerwa.asn.au/resources/2015-10-06-Privacy-Collection-Statement.pdf>

## 6. DO WE COLLECT HEALTH INFORMATION AND/OR SENSITIVE INFORMATION?

- 6.1** From time to time, we may collect health information and other sensitive information about you in order to provide our services.
- For example, we may collect medical information from you, if you are participating in a Cancer Support program such as Life Now. We may also collect medical information from you in order to refer you to specific support or advice relating to your cancer diagnosis.
- 6.2** However, we only collect sensitive information if the collection is reasonably necessary for one or more of our activities or functions; and we have your consent to collect that information.
- 6.3** The APPs list a number of circumstances that permit the collection of sensitive information about an individual without their consent. We only collect sensitive information without an individual's consent if one or more of those circumstances apply.

## 7. WHAT DO WE DO IF WE RECEIVE UNSOLICITED PERSONAL INFORMATION?

- 7.1** If we receive personal information that we did not solicit, we will, within a reasonable period of receiving the information, determine whether we would have been permitted to collect the information according to the APPs.
- 7.2** If we determine that we have received personal information that we **would not have been permitted to collect** under the APPs (and the information is not contained in a Commonwealth record), we will as soon as practicable and where it is lawful and reasonable to do so, destroy the information or ensure that it is de-identified.
- 7.3** If we determine that we would have been permitted to collect the personal information under the APPs, we will ensure that the information is dealt with in a manner that complies with our privacy policy and the APPs.

## 8. WHAT HAPPENS IF YOU DON'T PROVIDE YOUR PERSONAL INFORMATION?

- 8.1** Unfortunately, if you do not provide some or all of the personal information we request, we may not be able to offer you the services you have requested or process your registration/donation in cases where the information is critical for that purpose.

## 9. CAN YOU USE PSEUDONYMS OR INTERACT WITH US ANONYMOUSLY?

**9.1** Where practicable, you will be given the opportunity to engage with us on an anonymous basis, or using a pseudonym.

For example, you are able to make a donation anonymously, but we will not be able to send you a receipt or acknowledgement of your contribution and will not be able to keep you updated with how your donation has helped.

**9.2** In some circumstances, it may not be possible for us to provide a service without the knowledge of your identity.

For example, if you call our 13 11 20 Cancer Support and Information Service anonymously, we will be able to provide information and verbal support, but we will not be able to provide more specific support such as referral to counselling, practical support or other programs.

## 10. WHERE AND HOW DO WE STORE YOUR PERSONAL INFORMATION?

**10.1** We take all reasonable steps to protect all of the personal information that we hold from misuse, interference and loss, and from unauthorised access, modification or disclosure.

**10.2** Your personal information will be stored on a password protected electronic database, which may be on our database, a database maintained by a cloud hosting service provider or other third party database storage or server provider. Backups of electronic information are written to drives which are stored offsite.

**10.3** Hard copy information is stored in our offices, which are secured to prevent entry by unauthorised people. Any personal information not actively being used is archived, usually for seven years, stored in a secure facility.

**10.4** Where personal information is stored with a third party (for example through third party fundraising websites), we have arrangements which require those third parties to maintain the security of the information. We take reasonable steps to protect the privacy and security of that information, but we are not liable for any unauthorised access or use of that information.

**10.5** Your personal information will stay on the database indefinitely unless you advise you would like it de-identified. We may also de-identify your personal information if required by privacy law.

## 11. WHAT WE DO IF WE EXPERIENCE A DATA BREACH?

- 11.1** We take all reasonable steps to protect your personal information against a data breach. However, we do have a data breach response plan set up to ensure we contain, assess, notify and review any data breach. We also abide by the requirements of the Privacy Act's Notifiable Data Breach Scheme.

## 12. HOW DO WE USE YOUR PERSONAL INFORMATION FOR DIRECT MARKETING?

- 12.1** We are a not-for-profit, community-funded organisation that performs services for the benefit of the community and we may, from time to time, use your personal information for our own direct marketing purposes.

For example, if you register for a fundraising event, we may communicate with you in future via email, mail, phone or online advertising to promote a similar Cancer Council WA event we think you may be interested in or share updates on how your support has made a difference.

- 12.2** As a community-funded organisation we rely on donations from the public, so we may contact those who have used our services in the past or persons who have indicated that they may wish to assist us in the future, to seek funds to further enable us to continue to provide our services.
- 12.3** We also may use your personal information to communicate with you about support services we have available, cancer prevention programs, health promotion messages and cancer advocacy initiatives.

## 13. DO WE SHARE YOUR PERSONAL INFORMATION WITH OTHER COMPANIES FOR MARKETING PURPOSES?

- 13.1** No. We will never share your personal information with a third party (including other charitable organisations) for their own direct marketing purposes. We will only use your personal information to communicate with you ourselves about our own events, services, programs and initiatives.
- 13.2** We never participate in list-swapping or data-sharing with other organisations, including charitable organisations.

## 14. HOW CAN YOU OPT OUT OF DIRECT MARKETING COMMUNICATIONS?

- 14.1 Any time we use your personal information to send you marketing and promotional information by post, email or telephone, we will provide you with an opportunity to opt-out of receiving such information (or unsubscribe).
- 14.2 By not opting-out, we will assume we have your implied consent to receive similar information and communications in the future.
- 14.3 We will always ensure that our opt-out notices are clear, conspicuous and easy to take up. However, if you ever have trouble opting out of communication from us, or would like to opt out of all direct marketing at any time, please contact us at [privacy@cancerwa.asn.au](mailto:privacy@cancerwa.asn.au) or call 1300 65 65 85.

## 15. WHAT DATA DOES OUR WEBSITE COLLECT?

- 15.1 When you access our website, we may use software embedded in our website (such as Javascript) and we may place small data files (or cookies) on your computer or other device to collect information about which pages you view and how you reach them, what you do when you visit a page, the length of time you remain on the page, and how we perform in providing content to you.
- 15.2 A cookie does not identify you personally, but it does identify computers. You can set your browser to notify you when you receive a cookie and this will provide you with an opportunity to either accept or reject it in each instance.
- 15.3 We may gather your IP address as part of our business activities and to assist with any operational difficulties or support issues with our services. This information does not identify you personally.
- 15.4 We use Google Analytics features based on Remarketing, Google Analytics Demographics, and Interest Reporting. These features use cookies to inform and optimise content based on your past visits to our site.
- 15.5 We also use pixel tracking, which indicates when your computer has visited pages on our websites where a pixel has been installed. As with cookies, this does not identify you personally, only the device you are using.



- 15.6** Google Analytics informs us of how visitors use our site based on your browsing habits, so that we can improve our site to make it easier for you to find information. Google also receives this information as you browse our site and other websites on the Google Display Network using Remarketing.
- 15.7** If you would like to optout of customised Google Display Network services and Google Analytics for Display Advertising you can use Ad Settings ([https://www.google.com/settings/ads/anonymous?hl=en-GB&sig=ACi0TCh3xBIXtJa5uOeobUS\\_btjEcAlwxEoSjq25UqE9mxDlnK-vBicK9hJPU\\_1m9rrBHW-H-69YZ5BQuCraze6T17wTMvGEQ](https://www.google.com/settings/ads/anonymous?hl=en-GB&sig=ACi0TCh3xBIXtJa5uOeobUS_btjEcAlwxEoSjq25UqE9mxDlnK-vBicK9hJPU_1m9rrBHW-H-69YZ5BQuCraze6T17wTMvGEQ)) . You can also use the Google Analytics Optout Browser Addon (<https://tools.google.com/dlpage/gaoptout/>) so you are not tracked into Google Analytics.
- 15.8** Cancerwa.asn.au uses AddThis <http://addthis.com/> to provide social sharing functionality on its web pages. AddThis collects non-personally identifiable information from many of the websites in which AddThis is enabled, and uses that information to deliver targeted advertising on those websites as well as other websites you may visit.
- If you prefer AddThis not collect non-personally identifiable information about your website visits for the purpose of delivering targeted advertising, you may opt out by clicking on the “opt-out” button on the AddThis optout webpage. <http://www.addthis.com/privacy/opt-out#.T2AewXgznlY>
- When you opt out of AddThis, AddThis will place an opt-out cookie on your computer. The opt-out cookie tells AddThis not to use your information for delivering relevant online advertisements. Please note that if you delete, block, or otherwise restrict cookies, or if you use a different computer or Internet browser, you will need to renew your opt-out choice.
- For further information please read the AddThis privacy policy <http://www.addthis.com/privacy#.T2AgUHgznlY>

## 16. WHEN AND WHY DO WE DISCLOSE YOUR PERSONAL INFORMATION TO THIRD PARTIES?

- 16.1** We may need to disclose your personal information to other organisations in order to carry out our normal business activities (but never for direct marketing purposes). The type of organisations we may need to disclose your information to include:
- External support services: to health care professionals, lawyers, other professionals, counsellors, funders, financiers, co-ordinators, volunteers, service providers, agencies and not-for-profits that provide support services.
  - Contractors and service providers who perform services on our behalf: such as mailing houses, printers, information technology services providers (including offshore cloud computing service providers), database contractors.
  - Cancer Council Australia and state and territory Cancer Councils that are members of Cancer Council Australia
- 16.2** Wherever we propose to disclose your personal information to a third party not outlined above, we will provide you with a collection notice which explains the circumstances in which we might disclose your personal information.

## 17. DISCLOSURE OF YOUR PERSONAL INFORMATION TO OVERSEAS RECIPIENTS

- 17.1** From time to time, circumstances may arise where there may be a need for us to disclose personal information to an overseas recipient. This may occur in a range of circumstances, for example where data is being stored and accessed by way of cloud computing and other electronic means.
- 17.2** Before disclosing personal information to an overseas recipient, we will take such steps as are reasonable in the circumstances to ensure that the overseas recipient also complies with the APPs in relation to that information, unless the APPs do not require us to do so.
- 17.3** If your personal information is collected using a collection notice that references this Privacy Policy, you are taken to consent to the disclosure, transfer, storing or processing of their personal information outside of Australia. You also acknowledge and understand that by providing such consent that we will not be required to take such steps as are reasonable in the circumstances to ensure such third parties comply with the APPs.

## 18. HOW CAN YOU REQUEST ACCESS TO YOUR PERSONAL INFORMATION?

- 18.1** You can request access to your personal information by contacting us at:
- Privacy Officer  
Cancer Council Western Australia  
Level 1, 420 Bagot Road  
Subiaco, WA 6008
- Or by emailing [privacy@cancerwa.asn.au](mailto:privacy@cancerwa.asn.au), or calling (08) 9212 4333
- 18.2** We will, upon your request, and subject to applicable privacy laws, provide you with access to your personal information that is held by us. However, we request that you identify, as clearly as possible, the type(s) of information requested.
- 18.3** We will deal with your request to provide access to your personal information within 30 days and you agree we may charge you our reasonable costs incurred in supplying you with access to this information.
- 18.4** Your rights to access personal information are not absolute and privacy laws dictate that we are not required to grant access in certain circumstances such as where:
- access would pose a serious threat to the life, safety or health of any individual or to public health or public safety
  - access would have an unreasonable impact on the privacy of other individuals
  - the request is frivolous or vexatious
  - denying access is required or authorised by a law or a court or tribunal order
  - access would be unlawful, or
  - access may prejudice commercial negotiations, legal proceedings, enforcement activities or appropriate action being taken in respect of a suspected unlawful activity or serious misconduct.

If we refuse to grant you access to your personal information, we will provide you with reasons for that decision (unless it is unreasonable to do so) and the avenues available for you to complain about the refusal.

## 19. HOW CAN YOU SEEK CORRECTION OR UPDATE YOUR PERSONAL INFORMATION?

- 19.1** You may ask us to update, correct or de-identify the personal information we hold about you at any time.
- 19.2** We will take reasonable steps to verify your identity before granting access or making any corrections to or de-identifying your information. We also have obligations to take reasonable steps to correct personal information we hold when we are satisfied that it is inaccurate, out-of-date, incomplete, irrelevant or misleading for the purpose for which it is held.
- 19.3** You can request access to or correction of your personal information at any time by contacting us at:
- Privacy Officer  
Cancer Council Western Australia  
Level 1, 420 Bagot Road  
Subiaco, WA 6008
- Or by emailing [privacy@cancerwa.asn.au](mailto:privacy@cancerwa.asn.au), or calling (08) 9212 4333

## 20. HOW CAN YOU MAKE A COMPLAINT REGARDING YOUR PRIVACY?

- 20.1** If you have any queries or would like to make a complaint relating to our Privacy Policy or the manner in which we handle your personal information, please contact our Privacy Officer on (08) 9212 4333 or email [privacy@cancerwa.asn.au](mailto:privacy@cancerwa.asn.au).
- We endeavour to respond to complaints and queries within ten working days of receiving them.
- 20.2** If you are dissatisfied with our response, you may refer the matter to the Australian Information (Privacy) Commissioner (see [www.oaic.gov.au](http://www.oaic.gov.au)).

## 21. WHO CAN YOU CONTACT IF YOU REQUIRE FURTHER INFORMATION?

- 21.1** For further information about our Privacy Policy or how we handle your personal information, please contact our Privacy Officer at:
- Privacy Officer  
Cancer Council Western Australia  
Level 1, 420 Bagot Road  
Subiaco, WA 6008
- Or by emailing [privacy@cancerwa.asn.au](mailto:privacy@cancerwa.asn.au), or calling (08) 9212 4333