

## Privacy Policy Statement

Policy Owner:	General Manager - Finance & Governance
Department and Unit:	Finance & Governance – Governance
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### Approval

Approved by	Date
GM Governance and Finance	January 2024

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## **Policy Statement**

Cancer Council SA (**CCSA**) ensures a responsible, transparent and ethical framework is applied in accordance with this Privacy Policy (**Policy**) and Commonwealth legislative requirements. CCSA is bound by the Australian Privacy Principles (**APPs**) and the *Privacy Act 1988* (Cth) (**Privacy Act**). This Policy regulates the ways in which CCSA collects, holds, maintains, uses and discloses personal information, including health information.

This Policy applies if you:

- use any of CCSA's products and services;
- visit CCSA's main website at **cancersa.org.au** or any of our affiliated websites (**Sites**), visit any of our social media channels or subscribe to our mailing lists (**Channels**);
- are employed by us or are seeking employment with us;
- are one of CCSA's employees, board members, volunteers, donors or contractors; or
- persons who are otherwise engaged with CCSA in its activities and operations.

By providing us with your personal information, you consent to your 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 us. By continuing to use our products, services, Sites or Channels, or otherwise continuing to deal with us, you accept these changes and this Policy as it applies from time to time. However, if you do not agree to an amendment, you must discontinue your interactions or dealings with us (e.g. by not using our Sites, products or services or by unsubscribing from our Channels).

## **Definitions**

**Personal Information** – is 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 includes information such as:

- name, date of birth, gender and contact information
- health information
- credit/debit card information
- employee record information
- tax file number information



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**Sensitive Information** – is personal information that may include information or an opinion about an individual's:

- racial or ethnic origin
  - political opinions or associations
  - religious or philosophical beliefs
  - sexual orientation or practices
  - health or genetic information
  - some aspects of biometric information.
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**Collection of  
Personal  
Information**

**Whose Information CCSA Collects**

CCSA collects information only where it is necessary to enable the organisation to meet its business functions. Information may be collected from people who are connected to its operations and activities including:

- current and former employees, board members, volunteers;
- donors, research study participants, recipients of support services;
- participants in advocacy campaigns or health promotion projects;
- next-of-kin or emergency contacts;
- health professionals; and
- suppliers, contractors, and service providers.

Personal information CCSA may collect includes (as applicable):

**For customers:**

- contact information such as full name (first and last), e-mail address, current postal address and phone numbers;
  - identifying and diversity information (including your date of birth, gender, and whether you are of Aboriginal and/or Torres Strait Islander descent);
  - information you provide to us where you share your cancer experience story (including details of your experience, such as your cancer diagnosis and treatment);
  - your health and medical information (e.g. medical history, contact details for your medical practitioners and treatment providers etc.) as needed to determine your eligibility for our counselling, accommodation, social work or research services and program, and to provide those services and programs;
  - insurance policies and details;
  - opinions via surveys and questionnaires;
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- records of our communications or dealings with you, including any complaints, incidents, requests or queries;
  - details relating to the goods and services you have enquired about or have obtained from CCSA, including any additional information necessary to deliver those goods and services and respond to your enquiries;
  - details relating to donations you make to CCSA;
  - any relevant financial information (including bank account details, credit card details, billing address and invoice details);
  - personal identification documents (e.g. to administer refunds, to enable access to your information);
  - username and password when setting up an account on our website; and
  - any other personal information that may be required to facilitate your dealings with us and/or to assist us in conducting our business, providing and marketing our services and meeting our legal obligations.

**For job applicants, employees, volunteers or contractors:**

- your work and/or personal contact details (e.g. telephone, email, address etc);
- your financial information (e.g. bank account details or payment history for invoicing and/or payroll purposes);
- your superannuation fund details;
- your government identifiers (e.g. tax file number, driver's licence, passport and/or visa details);
- diversity information, which might include gender, ethnicity, languages spoken, relationship status etc;
- your relevant health information;
- personal information from your personal, professional or trade references; and
- information about your occupation, employment history, education and suitability for the role or relationship, including criminal history, social media profiles and whether you hold any police or working with children clearances required for the role.

Where possible and if requested, CCSA enables customers to interact with them anonymously or using a pseudonym (such as when using Cancer Council SA's 13 11 20). Anonymity or pseudonymity, however, may affect



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the capacity of CCSA to provide some services. This is communicated on a case-by-case basis.

### **How CCSA Collects Information**

CCSA may collect personal information from or about you in different ways. CCSA will generally collect personal information directly from you, including when you:

- purchase a product or use a service (e.g. social work, counselling, nursing advice), provided by CCSA;
- provide a donation or bequest of funds;
- interact with us (e.g. by email or phone) or submit information to our Sites or Channels;
- provide information or opinions via surveys or questionnaires;
- utilise accommodation services at CCSA;
- attend or organise a CCSA event;
- provide feedback to us or complete a survey; and
- participate in CCSA research.

CCSA may also obtain personal information from third parties such as contractors, including fundraising/marketing service providers, health professionals and social and community workers.

If you have provided CCSA with information about another person, you warrant that you have that person's permission to do so. Your obligations under Privacy Act 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 we will handle their personal information in accordance with this Policy.

### **Website cookies**

To improve our Sites and advertising and to help us better understand browsing behaviour, when you use our Sites we 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 our Sites. We may also use analytics tools available on our Channels. This information is aggregated and anonymised so that you cannot be identified.

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This information is gathered as part of CCSA's business activities and to assist us with any operational difficulties, gain efficiencies, understand browsing behaviour or provide support with our web-based services.

Like many other websites on the internet, CCSA may use 'cookies' to store and track information about you when you are on our 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 Sites or Channels.

This information helps us to remember your preferences and can help us to provide a tailored experience and customised content and material on our Sites and Channels. This information may be retained in an anonymous or aggregated form after we 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 we offer.

CCSA provides links or references to other websites from our Sites or Channels. This Policy does not apply to those websites, and we take no responsibility for any information collected by such third parties.

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**Use of Personal  
Information**

CCSA collects personal information for the primary purpose to carry out its functions and activities, including to provide support to South Australians impacted by cancer, undertake research and support the reduction in preventable cancers through advocacy.

To support these functions, the purposes which CCSA may use and disclose personal information includes:

- the provision of our services, including but not limited to counselling, support services, and accommodation;
  - undertake fundraising, including the processing of donations and/or grants;
  - the processing of scholarships and/or awards;
  - undertaking and publishing results of research and related documentation;
  - processing and communicating information about orders;
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- supporting the work of contractors, employees, and volunteers within CCSA;
  - providing direct marketing (including joint marketing) about our products, services, events, fundraising and other promotional activities, either in relation to us, other Cancer Councils, or other similar charities and causes;
  - to respond to any feedback, queries or complaints;
  - the improvement of services (including contacting individuals regarding participation in surveys);
  - to maintain and administer employee and contractor records and payments;
  - to assess suitability of potential employees or contractors and performance of current employees or contractors;
  - to ensure health and safety on our premises;
  - if required, the verification of identity in communicating with individuals;
  - to comply with our legal obligations and reporting obligations; and
  - as otherwise required for the conduct of our business.

### **Opting Out of Direct Marketing Communications**

CCSA may use personal information collected for related secondary purposes to provide cancer support, research and prevention activities. This includes sending general and promotional material by post, email, telephone or SMS and face to face to identify programs or services you may be interested in, and other promotions, events and offers. CCSA will provide individuals with information regarding the secondary purposes at time of collection and provides the opportunity for individuals to withdraw consent by utilising the opt-out link on all marketing communications or by contacting the Privacy Officer directly.

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#### **Disclosure of Personal Information**

##### **Disclose to third parties**

CCSA 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 we may disclose your personal information may include :



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- External support services – to health care professionals, lawyers, counsellors, volunteers and other external support service providers.
  - Third party researchers – to support research studies in relation to cancer, as well as diagnosis, treatment and cures (provided that informed consent has been obtained and in accordance with research ethics and requirements);
  - Third-party service providers, government departments and agencies, and medical health personnel that may assist CCSA with financial support, transportation, accommodation services, counselling, fundraising, support services;
  - CCSA's contractors, service providers and agents, who perform services on CCSA's behalf, such as professional advisory, marketing and advertising, data analysis, recruitment, website and information technology services (including offshore cloud computing service providers), business and administrative services, database contractors and telemarketing agencies; and
  - Cancer Council Australia and State and Territory Cancer Councils that are members of Cancer Council Australia.

### **Cross border disclosures**

CCSA may from time to time engage an overseas recipient to provide services to us, such as cloud-based storage solutions. As a result, personal information provided to CCSA may be disclosed to, and stored at, destinations outside Australia. Please click [here](#) to review the list of current countries outside Australia which constitute a cross border disclosure.

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 us 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.



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**Access and  
correction of  
Personal  
Information**

**Access**

You are entitled to access the personal information we hold about you and may do so by contacting our Privacy Officer. In processing your request, we will comply with our obligations under the Privacy Act, noting that we may need to verify your identity before we allow you to access your personal information, and are permitted to withhold the disclosure of personal information in prescribed circumstances.

Requests for information and /or alteration can be made directly to the CCSA Privacy Officer in writing (see details below). The requester must identify, as clearly as possible, their full name, the type(s) of information they require, or outline their requested changes.

If CCSA refuses to grant you access to your personal information, CCSA will provide you with the rationale for this decision in writing and the avenues for complaining about CCSA's response, unless it is unreasonable to do so.

CCSA may charge a reasonable fee for facilitating an access request (being limited to the amount of the reasonable expenses incurred in responding to the request, for example photocopying and administrative expenses).

**Correction**

If you believe the personal information CCSA holds about you is inaccurate, incomplete, or out of date, please contact our Privacy Officer. If you satisfy us that any personal information, we hold about you is not accurate, complete or up to date, we will amend our records accordingly.

CCSA will respond to the request to provide access to / change personal information within 30 days.

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**Protection of  
Information**

**Data Security**

CCSA takes all reasonable steps to protect the personal information it holds from misuse, interference, loss, and from unauthorised access, modification, or disclosure.

To uphold strong protocols of information protection, CCSA maintains strict protocols regarding the storage, transfer and destruction of the information it holds.

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### **Data Retention and Destruction**

Personal and sensitive information is stored for only as long as it is required for 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.

Where CCSA no longer requires your personal information, we will use reasonable endeavors to comply with our legal obligations in respect of that information (e.g. by de-identifying or destroying such personal information).

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### **Variations**

The Policy is current at January 2024. The Policy is reviewed a minimum of every 3 years or as required from time to time to reflect changes in the law and technology, changes in CCSA's business functions, operations or practices, or in response to an opportunity for improvement or change in business environment.

Our Privacy Policy Statement is available on the CCSA website and all changes to the Policy will be published on the website.

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### **Privacy Contact Officer**

CCSA maintains an appointed Privacy Officer who is responsible for advising on matters relating to privacy and is the contact person for all enquires in relation to privacy matters. They can be contacted on:

**Privacy Officer:**

**Call:** (08) 8291 4111

**Facsimile:** (08) 8291 4122

**Email:** [privacy@cancersa.org.au](mailto:privacy@cancersa.org.au)

**Write to us:** PO Box 929, Unley BC SA 5061

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### **Complaints and Feedback**

If you have any queries and/or complaints relating to the manner in which your personal information was handled, or in relation to the Policy, you can contact the Privacy Officer directly.

CCSA will respond to complaints and queries within 30 days of the date of receipt. If you are dissatisfied with CCSA's response or handling of 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](mailto:enquiries@oaic.gov.au).



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**References**

- [Office of the Australian Information Commissioner \(OAIC\)](#)
  - [Privacy Act 1988 \(Cth\)](#)
  - [Charities Act 2013 \(Cth\)](#)
  - [Australian Privacy Principles](#)
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