

# Privacy Procedures

Procedures number	PProc2015	Version	001
Drafted by	Sara Graham	Approved by CEO on	15/08/2015
Responsible person	Sara Graham	Scheduled review date	15/08/2017

## RESPONSIBILITIES

Straight Arrows' Board is responsible for developing, adopting and reviewing this policy.

Straight Arrows' CEO 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.

## PROCESSES

### Collection

Straight Arrows Inc. will:

- Only collect information that is necessary for the performance and primary function of Straight Arrows Inc.
- Notify stakeholders about why we collect the information and how it is administered.
- Notify stakeholders that this information is accessible to them.
- Collect personal information from the person themselves wherever possible.
- If collecting personal information from a third party, be able to advise the person whom the information concerns, from whom their personal information has been collected.
- Collect Sensitive information only with the person's consent. (Sensitive information includes health information and information about religious beliefs, race, gender and others).
- Determine, where unsolicited information is received, whether the personal information could have collected it in the usual way, and then if it could have, it will be treated normally. (If it could not have been, it must be destroyed, and the person whose personal information has been destroyed will be notified about the receipt and destruction of their personal information).

### Use and Disclosure

Straight Arrows Inc. will:

- Only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose.
- For other uses, Straight Arrows Inc. will obtain consent from the affected person.
- In relation to a secondary purpose, use or disclose the personal information only where:
  - a secondary purpose is related to the primary purpose and the individual would reasonably have expected us to use it for purposes; or

- the person has consented; or
- certain other legal reasons exist, or disclosure is required to prevent serious and imminent threat to life, health or safety.
- In relation to personal information which has been collected from a person, use the personal information for sending communications, where that person would reasonably expect it to be used for this purpose, and Straight Arrows Inc. has provided an opt out and the opt out has not been taken up.
- In relation to personal information which has been collected other than from the person themselves, only use the personal information for sending communications if the person whose personal information has been collected has consented (and they have not taken up the opt-out).
- State in Straight Arrows' privacy policy whether the information is sent overseas and further will ensure that any overseas providers of services are as compliant with privacy as Straight Arrows Inc. is required to be.
- Provide all individuals access to personal information except where it is a threat to life or health or it is authorized by law to refuse and, if a person is able to establish that the personal information is not accurate, then Straight Arrows Inc. must take steps to correct it. Straight Arrows Inc. may allow a person to attach a statement to their information if Straight Arrows Inc. disagrees it is inaccurate.
- Where for a legal or other reason we are not required to provide a person with access to the information, consider whether a mutually agreed intermediary would allow sufficient access to meet the needs of both parties.
- Make no charge for making a request for personal information, correcting the information or associating a statement regarding accuracy with the personal information.

#### **Storage**

- Implement and maintain steps to ensure that personal information is protected from misuse and loss, unauthorized access, interference, unauthorized modification or disclosure.
- Before Straight Arrows Inc. discloses any personal information to an overseas recipient including a provider of IT services such as servers or cloud services, establish that they are privacy compliant. Straight Arrows Inc. will have systems which provide sufficient security.
- Ensure that Straight Arrows' data is up to date, accurate and complete.

#### **Destruction and de-identification**

- Destroy personal information once is not required to be kept for the purpose for which it was collected, including from decommissioned laptops and mobile phones.
- Change information to a pseudonym or treat it anonymously if required by the person whose information Straight Arrows Inc. holds and will not use any government related identifiers unless they are reasonably necessary for our functions.

#### **Data Quality**

Straight Arrows Inc. will:

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

### **Data Security and Retention**

Straight Arrows Inc. will:

- Only destroy records in accordance with the organisation's Records Management Policy.

### **Openness**

Straight Arrows Inc. will:

- Ensure stakeholders are aware of Straight Arrows' Privacy Policy and its purposes.
- Make this information freely available in relevant publications and on the organisation's website.

### **Access and Correction**

Straight Arrows Inc. will:

- 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.

### **Anonymity**

- Allow people from whom the personal information is being collected to not identify themselves or use a pseudonym unless it is impracticable to deal with them on this basis.

### **Making information available to other organisations**

Straight Arrows Inc. can:

- Release information to third parties where it is requested by the person concerned.

## **AUTHORISATION**

Sara Graham

Executive Officer

15 August, 2015

