

SUMMIT DISABILITY NETWORK – PRIVACY POLICY

OUR COMMITMENT TO PROTECT YOUR PRIVACY

Summit Disability Network Limited ACN 609 513 733 (known as "Summit Disability" and also referred to in this Policy as "us," "we" and "our") seeks to provide the best possible service to our clients and their families.

We understand how important it is to protect your personal information. This document sets out our Privacy Policy commitment in respect of personal information that you may provide to us.

We recognise that any personal information we collect about you will only be used for the purposes indicated in our policy, where we have your consent to do so, or as otherwise required or authorised by law. It is important to us that you are confident that any personal information we collect from you or that is received by us will be treated with appropriate respect ensuring protection of your personal information.

Our commitment in respect of personal information is to abide by the *Privacy Act 1988* (Cth) and any other relevant law.

WHO IS SUMMIT DISABILITY NETWORK?

Summit Disability provides assistance to people with disabilities and their families to enable them to actively participate in sports, recreation and holidays by developing educational programs that aim to enhance life skills.

PERSONAL INFORMATION

When we refer to **personal information** we mean information or an opinion about you, from which you are, or may reasonably be, identified.

This information may include (but is not limited to) your name, date of birth, driver's licence number, medical information, marital status, phone number, email address and address.

Due to the nature of the services provided by us, some of the information we collect may be sensitive information, including details about your health.

It is not common practice for us to collect other sensitive information about you (such as information about your religion, trade union membership, political opinion, sexual preference or criminal record). We will only collect sensitive information about you with your knowledge or consent.

WHY WE COLLECT YOUR PERSONAL INFORMATION

We collect and receive personal information about you in order to conduct our business; provide individuals with services; manage our relationships with our clients, their families, government agencies, business partners and other entities; marketing our services and complying with the law and other regulatory requirements. From time to time we may offer other services.

HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

Personal information may be collected by us in a number of circumstances, including when an individual:

- makes an enquiry via email or telephone or website;
- meets with us to discuss the services we provide;
- requests a booking for an activity, event or outing;
- attends a program, activity or other event hosted by us; or
- applies to work with us.

Where reasonable and practical we will collect your personal information only directly from you. However, we may also collect information about users of our services and potential users of our services from third parties such as contractors who supply services to us, government agencies our business partners, from publicly maintained records or from other individuals or companies as authorised by the individual concerned. If you do not provide the information requested by us, we may not be able to provide you with the appropriate services.

If you provide personal information to us about someone else, you must ensure that you are entitled to disclose that information to us and that, without us taking any further steps required by privacy laws, we may collect, use and disclose such information for the purposes described in this Privacy Policy. For example, you should take reasonable steps to ensure the individual concerned is aware of the various matters detailed in this Privacy Policy. The individual must also provide the consents set out in this Privacy Policy in respect of how we will deal with their personal information.

HOW DO WE USE YOUR PERSONAL INFORMATION?

We use your personal information for the purpose for which it has been provided, for reasonably related purposes, any other purpose you have consented to and any other purpose permitted under the Privacy Act. This may include using your personal information for the following purposes:

- to provide you with the services you requested;
- to assess, process and manage your application to work with us; or
- for complaints handling or data analytics purposes.

TO WHOM WILL WE DISCLOSE YOUR PERSONAL INFORMATION?

To enable us to maintain a successful relationship with you, we may disclose your personal information to:

- government agencies;
- your doctors and therapists;
- companies and contractors who we retain to provide services for us, such as travel agents, IT contractors, lawyers, accountants and auditors, who will need to have access to your personal information to provide those services;
- people considering acquiring an interest in our business or assets; and
- other individuals or companies authorised by you.

By providing us with your personal information, you consent to us disclosing your information to such entities without obtaining your consent on a case by case basis.

Sometimes we are required or authorised by law to disclose your personal information. Circumstances in which we may disclose your personal information would be to a Court, Tribunal or law enforcement agency in response to a request or in response to a subpoena or to the Australian Taxation Office.

We may from time to time transfer personal information outside Australia in accordance with the Privacy Act to countries whose privacy laws do not provide the same level of protection as Australia's privacy laws. For example, we may transfer your personal information to countries located in Asia, Europe or the USA.

By providing us with your personal information, you consent to us disclosing your information to entities located outside Australia and, when permitted by law to do so, on the basis that we are not required to take such steps as are reasonable in the circumstances to ensure that any overseas recipient complies with Australian privacy laws in relation to your information.

DIRECT MARKETING

From time to time we may use your personal information to provide you with current information about special offers you may find of interest, changes to our organisation, or new services being offered by

us or any company with which we are associated. By providing us with your personal information, you consent to us using your information to contact you on an ongoing basis for this purpose, including by mail, email, SMS, social media and telephone.

If you do not wish to receive marketing information, you may at any time decline to receive such information by contacting our Privacy Contacts using the contact details below. We will not charge you for giving effect to your request and will take all reasonable steps to meet your request at the earliest possible opportunity.

UPDATING YOUR PERSONAL INFORMATION

It is important to our relationship that the personal information we hold about you is accurate and up to date. During the course of our relationship with you we will ask you to inform us if any of your personal information has changed.

If you consider that any information we hold about you is incorrect, you should contact us to have it updated. We will generally rely on you to assist us in informing us if the information we hold about you is inaccurate or incomplete.

ACCESS TO YOUR PERSONAL INFORMATION

We will provide you with access to the personal information we hold about you, subject to limited exceptions in the Privacy Act as outlined below. You may request access to any of the personal information we hold about you at any time.

To access personal information that we hold about you, use the contact details specified below. We may charge a fee for our reasonable costs in retrieving and supplying the information to you.

DENIED ACCESS TO PERSONAL INFORMATION

There may be situations where we are not required to provide you with access to your personal information. For example, such a situation would be information relating to an existing or anticipated legal proceeding with you, or if your request is vexatious.

An explanation will be provided to you if we deny you access to your personal information we hold.

SERVICES WITHOUT IDENTIFYING YOU

In most circumstances it will be necessary for us to identify you in order to successfully provide services to you, however, where it is lawful and practicable to do so, we will offer you the opportunity of receiving our services or information about our services without providing us with personal information. Such a situation would be where you make general inquiries about our services.

HOW SAFE AND SECURE IS YOUR PERSONAL INFORMATION THAT WE HOLD?

We will take reasonable steps to protect your personal information by storing it in a secure environment, and when the information is no longer needed for any purpose for which the information may be used or disclosed, it will be destroyed or permanently de-identified.

We will also take reasonable steps to protect any personal information from misuse, loss and unauthorised access, modification or disclosure.

FURTHER INFORMATION AND COMPLAINTS

You may request further information about the way we manage your personal information or lodge a complaint by contacting our Privacy Officer(s) on the contact details below.

We will deal with any complaint by investigating the complaint, and providing a response to the complainant within 15 business days, provided that we have all necessary information and have

completed any investigation required. In cases where further information, assessment or investigation is required, we will seek to agree alternative time frames with you.

CONTACT DETAILS

You can contact us by emailing paul.edinborough@summitdisability.org.au or by writing to:

The Privacy Officer
Summit Disability Network Limited
PO Box 555
KELLYVILLE NSW 2155

CHANGE IN OUR PRIVACY POLICY

We are constantly reviewing all of our policies and attempt to keep up to date with market expectations. Technology is constantly changing, as is the law and market practices.

As a consequence we may change this Privacy Policy from time to time or as the need arises.

This Privacy Policy was last updated in **December 2016**.