

Diabetes Australia Group

Privacy Policy






Version 1, 2022

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1 We're here to help. Get in touch.

You can get in touch with us at any time about the way we handle and safeguard your information.

| If you want to: | |
|---|-------------------------|
|  | ask questions |
|  | update your information |
|  | register a concern |
|  | opt out of marketing |
|  | anything else... |
| we're just a phone call or a few clicks away. | |

If you have any questions or complaints about how we handle your information, you can get in touch with our Privacy Officer at:

| | |
|-----------------|--|
| Email: | privacy@diabetesaustralia.com.au |
| Phone: | (02) 6232 3800 |
| Address: | Privacy Officer Diabetes Australia GPO Box 3156 Canberra ACT 2601 |

2 About Us

Diabetes Australia (together with our related companies) is the national body for people living with all types of diabetes and those at risk. We support people at risk of and living with diabetes, their families and support persons and their communities, health professionals and researchers particularly concerned with the treatment and prevention of diabetes.

Protecting your privacy and ensuring that you control the way your information is used is our priority. We want to make sure you are fully informed about the way we handle your information. In this policy we explain the different types of personal information we collect, how we may collect and use it, who we may share it with, and the rights you have over your information.

By providing personal information to us, you give your active consent to our collection, use and disclosure of your personal information in accordance with this policy and any other arrangements that apply between us.

We mean what we say

In this policy when we say:

- **Diabetes Australia, we, our or us** – we mean Diabetes Australia Limited (ACN 008 528 461) and each of our subsidiaries that we either wholly or majority own.
 - **our products and services** – we mean diabetes support, education, and prevention programs, fundraising, research, delivery of government-funded programs, our Diabetes Shop, and other services provided to both members and non-members, and healthcare professionals (whether in person, online, over the phone or otherwise).
 - **your information** – we mean your personal information, which we describe in section three.
 - **our partners** – we mean our related companies, third party service providers and other organisations that we partner with to help us deliver services to you, including software service and hosting providers.
- privacy laws** – we mean all privacy and data protection laws that apply to us when we handle your information, including the Australian *Privacy Act 1998* (Cth) and the Australian Privacy Principles contained therein, and applicable health information laws such as the *Health Records and Information Privacy Act 2002* (NSW), the *Health Records Act 2001* (Vic) and the *Health Records (Privacy and Access) Act 1997* (ACT).
- **NDSS** – we mean the National Diabetes Services Scheme.

3 What information do we collect?

We collect and hold various categories of your information, including personal information, health information, device information, and general information to help us improve our services.

Set out below are the main categories of personal information we collect and hold when you access or use our services. If you choose not to provide the information we request from you, we may not be able to provide you with the services you require.

| Category | Details |
|-----------------------------------|---|
| Your general personal information | This includes information or an opinion about you that is reasonably identifiable. For example: your name, address, age or date of birth, gender, contact number and email address. In certain circumstances, this may also include your Medicare number, Department of Veterans' Affairs number, Commonwealth concession card details, passport, or student visa details and NDSS registration number. |
| Payment information | We may collect payment processing information from you for you to pay for purchases or make donations. This includes your credit card and bank account details. |
| Your health information | This includes any health information that you provide when accessing or using our services. For example, we might ask for your weight, diabetes type, cholesterol and HbA1c levels, details of the medication and NDSS products you require to manage your diabetes, whether your immediate relatives have had diabetes and how your diabetes is currently managed. We may collect this information as part of your initial online or in-person consult or at events so that we can develop the right health care or diabetes management plan for you. We will only collect your health information with your consent (as outlined in section |

| Category | Details |
|--|---|
| Your other sensitive personal information | In some circumstances, we will collect sensitive personal information other than health information. This includes whether you are of Aboriginal or Torres Strait Islander origin and your main language spoken at home. We will only collect your sensitive personal information with your consent (as outlined in section six). |
| Device information | This includes your device ID, device type, geo-location information, computer and connection information, statistics on page views, traffic to and from the sites, ad data, IP address and standard web log information. |
| Product and service details | We may collect details of the products and services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and services to you and respond to your enquiries. |
| Additional information you provide | This includes information you provide to us through surveys, directly through our website or indirectly through your use of our website or online presence or through other websites or accounts from which you permit us to collect information. |
| Information collected for our own business improvement | We may de-identify your general personal information and use it in aggregate form to conduct analysis on how our website and services are being used, to help us improve our services and provide benefits back to our members and customers. When we refer to 'de-identified' information, we mean information that has undergone a process of removing all personal identifiers that can reasonably identify you so that there is no reasonable likelihood of re-identification occurring. When we use this information for the purposes of business improvement, it is always in de-identified form and cannot be used to re-identify you. |
| Information collected by cookies | We may collect de-identified information via cookies on our website, such as your browser type, operating systems and other websites visited. We may also collect some personal information when using cookies, such as where a cookie is linked to your account. There are more details about cookies in section 10. |
| Information collected for recruitment purposes | When you apply for a job or position with us, we may collect certain personal information from you (including your name, contact details, working history and relevant records checks) from any recruitment consultant, your previous employers and others who may be able to provide information to us, to assist in our decision on whether or not to make you an offer of employment or engage you under a contract. |

4 Children and young people's privacy

We are committed to protecting the privacy of children and young people. When we intend to collect personal information from children, we take additional steps to protect their privacy, including:

| Category | Details |
|------------------|--|
| Notify parents | We notify parents or guardians about our information practices about children, including the types of personal information we may collect from children, the uses to which we may put that information, and whether and with whom we may share that information. |
| Obtain consent | In accordance with applicable law, and our practices, we obtain consent from parents or guardians for the collection of personal information from their children, or for sending information about our products and services directly to their children. |
| Limit collection | We limit our collection of personal information from children to no more than is reasonably necessary to participate in our services. |

Parents and guardians can exercise privacy rights on their children's behalf; however, we may need to verify that you are authorised to act on their behalf and collect additional information from you to do so.

5 How do we collect your information?

We collect your information directly from you when you engage with us, or indirectly from third parties.

In many instances, we collect your information directly from you. Here are some ways we do this.

| Category | Details |
|----------------|--|
| Face to face | When we speak in person, for example during expos, events, or interviews. |
| Over the phone | When you call us, including on our telephone information lines in New South Wales, Queensland, and Tasmania. |
| Online | When you interact with our online services, including when you sign up to and use our online member and donation portals, our online shop, or the member email system. |
| In writing | When you provide us with written information, including when you use our online member and donation portals, the online shop or member email system. |

We may also collect information about you from our partners. For example:

- with your consent, we may collect information like your diabetes care plan and contact details from organisations or health care professionals associated with providing the NDSS;
- we may collect information from providers of personal information available in the public domain or list purchase providers; and
- when you apply for a job or position with us, we may collect information about you from any recruitment consultant, your previous employers, referees, CV checking agencies or others who may be able to provide information to assist us with our decision.

As a NDSS Agent (usually a state or territory diabetes organisation), providing NDSS services, any personal information we receive as Agents of the NDSS is handled in accordance with the [NDSS privacy policy](#).

6 How do we use your information?

We won't use your health or sensitive personal information without your consent.

We won't use your health or sensitive personal information for any purpose without your consent to use it in that way (for example, if you agree to us providing you with information to improve your health, well-being, or care), except where we are permitted or required to do so at law.

If we ever want to use your health or sensitive personal information for a new or different purpose, we won't do so without obtaining your consent. Even once you've provided your consent for a particular use, you can withdraw it at any time. As well as getting your consent, we always handle your health or sensitive personal information in accordance with our applicable legal requirements, including our obligations when we collect those types of information from our partners (with your authorisation).

Before you provide your consent, you should know that we may from time to time need to respond to legal requests for information (like any organisation does).

We use your personal information to enable us to deliver and improve our products and services.

We may collect, hold, use, and disclose your personal information for the following purposes:

| Category | Details |
|---|--|
| Access | To enable you to access and use our products and services. |
| Improvement | To design, provide, improve, and manage our products and services and your experience, including to perform analytics, conduct research and for advertising and marketing. |
| Support | To send you service, support and administrative messages, reminders, technical notices and product safety updates, general updates, security alerts, and information requested by you. |
| Contact | To contact you when we need to tell you something important about the services or your information. |
| Marketing | To send you marketing and promotional messages and other information that may be of interest to you, including information sent by, or on behalf of, our business partners or like-minded charities that we think you may find interesting. More details about our use of your information for marketing is outlined in section seven. |
| Promotions | To administer rewards, surveys, contests, or other promotional activities or events sponsored or managed by us or our business partners. |
| Law | To comply with laws and assist government or law enforcement agencies where we are required and authorised to do so. To consider your employment or contract application. |
| Employment Other purposes when de-identified and/or aggregated | We may de-identify and/or aggregate your personal information. When we do this, we may use that de-identified information for other purposes that may not be set out in this policy. We may also share this de-identified information with our partners for those partners' other purposes, which are not set out in this policy. |

7 How do we use your personal information for marketing?

We may use your information for marketing purposes, but only with your consent and you can opt-out at any time.

We may send you direct marketing communications and information about our services, or about other like-minded organisations' products and services, where you provide us with your active consent to do so. This may take the form of emails, SMS, mail, or other forms of communication. We'll always conduct our marketing practices in accordance with privacy laws and other applicable laws.

If you do consent to us sending you marketing messages using your information, you'll be able to opt out at any time – either by using the unsubscribe facility in the relevant message or by contacting us (it's easy – see section one 1).

We may also market our services to you generally – including via social media, advertising through our website or through third party websites and other digital or non-digital platforms. We'll always do this in accordance with our legal requirements and only with our partners.

Without your consent, we will not:

- use any of your personal information to send you marketing communications; or
- disclose any of your personal information to a third party for them to market to you.

8 Do we store or share your information outside of Australia?

We may store and disclose your personal information overseas.

We may disclose personal information or de-identified information outside of Australia to third party suppliers (including cloud providers) located in Singapore, Canada, the United States, Germany, and Ireland. We take reasonable steps to ensure that any overseas recipient will deal with personal information (including health-related and other sensitive personal information) in a way that is consistent with the Australian Privacy Principles.

9 Who do we share your information with?

We may share your personal information with our partners and for other reasons we tell you about in this policy (including in sections 6 and 7 of this policy).

We may share your personal information with:

- our employees and related companies;
- third party suppliers and service providers (including providers for the operation of our websites and/or our business or in connection with providing our products and services to you) where those external parties have signed a confidentiality agreement that requires them to comply with the privacy laws and our Privacy Policy;
- other like-minded charities, for the purpose of them providing you with information about their activities or services that you may find interesting;
- professional advisers, dealers and agents;
- payment systems operators (eg, merchants receiving card payments);
- our existing or potential agents, business partners or partners;
- our sponsors or promoters of any competition that we conduct via our services;
- anyone to whom our assets or businesses (or any part of them) are transferred;
- specific third parties authorised by you to receive information held by us; and/or
- other persons, including government agencies, regulatory bodies, and law enforcement agencies, or as required, authorised, or permitted by law.

10 Using our website and cookies

We use cookies on our website to track your website usage and remember your preferences.

Our website includes pages that use cookies, which are small files that store information on your computer, mobile phone, or other device. We may use them to recognise you across devices and browsing sessions, and collect data from you when you visit our website regarding

- your number of website visits;
- the date and time of your website visits;
- the number of pages you viewed on our website; and
- how you navigated through the website.

You can configure your internet browser to accept all cookies, reject all cookies or notify you when a cookie is sent. If you refuse the use of cookies in this way, then you may not be able to access the full functionality of our website. Please refer to your internet browser's instructions or help screens to learn more about these functions.

Our website may contain links to websites operated by third parties. Those links are provided for your convenience and may not remain current or be maintained. We have no control over and are not responsible for any content or privacy practices of those linked websites. As the privacy policies that apply to those other websites may differ substantially from ours, we encourage you to read them before using those websites.

We may also use third party analytics tools to help us gather and analyse device information. For example, our website uses Google Analytics, a web analytics service provided by Google, Inc. (**Google**). Google Analytics also uses cookies. Although these cookies do not identify you personally, they allow information about your use of our website (including your IP address) to be transmitted to Google. For more information, please see Google's site "*How Google uses data when you use our partners' sites or apps*", located at www.google.com/policies/privacy/partners/. **By using our website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.**

11 How do we protect your information?

We take a number of measures to keep your information safe and secure.

We generally hold personal information in our electronic databases but also store personal information in hard copy form and in various third-party databases and platforms.

Our website and our working environment are built with integrated physical, electronic, and managerial processes designed to safeguard your information and protect it from misuse, interference loss and unauthorised access, modification, or disclosure.

Here are some of the key things we may do from time to time to protect your information.

| Category | Details |
|---|--|
| Staff training | We put our staff through training about how to always keep your information safe and secure. |
| Secure storage and handling | We use a combination of techniques and measures to maintain the security of our website and to protect your account and your information. |
| Partner standards | We take reasonable steps to ensure that our partners to whom we disclose your information, protect it to the same standard and using equivalent measures and safeguards. |
| Destroying or de-identifying your information | We only keep your information for as long as we need it or are lawfully required to keep it. |

12 What are your rights in relation to your information?

You have various rights in relation to your personal information. You can contact us to exercise any of your rights in relation to your information at any time.

Here are the things you can ask us to do in relation to your information at any time while you use our website or services.

| Category | Details |
|----------|--|
| Access | You can request a copy of your information. |
| Correct | You can ask us to correct or update your information. |
| Complain | You can express your concerns or complaints to us about your privacy or the way we are handling your information. We take your concerns seriously and will seek to resolve any issue or concern as soon as possible. |

Where we are not able to fulfil your request to access, correct or delete your personal information for a legal or other reason, we will let you know why. We may also need to verify your identity when you request your personal information. We will aim to respond to your request within 10 business days.

If you're not happy with the way we handle your query or handle your information (including our response to your request to access, correct or delete your personal information), you have a right to lodge a complaint with the Office of the Australian Information Commissioner (**OAIC**) by visiting the OAIC website (the details are set out at section 16 below).

13 Employees

We are bound by the Australian Privacy Principles contained in the Privacy Act. However, those principles do not apply to certain records and practices relating to the employment relationship between us and our current and former employees in Australia. As such, most of the information contained in this policy does not apply to how we use and disclose information relating to our current and former employees. If you are a current or former employee of us (including our related companies) we may collect personal information from you as part of our employment relationship.

This information may include:

| Category | Details |
|------------------------------------|---|
| Your general personal information | This includes information or an opinion about you that is reasonably identifiable. For example: your name, address, age, or date of birth, contact number, email address and image. |
| Educational and social information | This includes details of your education, references from your institutions of study, and information relating to your interests and extra-curricular activities. It also includes lifestyle information and social circumstances, for example 'life events' such as marriage, divorce, bereavement, or adoption or birth of children. |
| Sensitive information | This includes information concerning your health and medical conditions, disability, certain criminal convictions, and offences, racial or ethnic origin, religious or philosophical beliefs, sexual orientation, and trade union membership. |
| Financial information | This includes your bank account number, tax identifier and status (including residence status), and credit checks (where required). |
| Work related information | This includes details of your work history, professional activities and interests, involvement with and membership of industry bodies and professional associations and any personal information captured in the work product(s) you create while employed by us. |

If you are a current or former employee and you have any questions in relation to our handling of your personal information, please contact the Privacy Officer using the contact information in section 1.

14 Changes to this policy

If we need to change this policy in a way that affects how we handle your information, we will publish the changes to it on our website. If you are a Diabetes Australia member [or existing or former customer], and we have your email on file, we may also send you an email to let you know about the changes. We encourage you to check our website periodically to ensure that you are aware of our current privacy policy.

15 Related companies

All our related companies handle your personal information in accordance with this policy. Our related companies include all companies that are wholly owned, or majority owned by Diabetes Australia Limited. For clarity, this policy does not apply to the Diabetes Overseas Aid Fund (which trades as Life for a Child). While Diabetes NSW is its registered trustee, Life for a Child is its own registered charity that runs separately to Diabetes Australia and has its own privacy policy that outlines how it handles personal information, which is available at <https://lifeforachild.org/privacy/>.

16 Find out more

You can find out more about the various privacy laws and other rules, regulations and standards we've mentioned in this policy, or lodge a complaint where you are not happy with the way we've handled your query or your information (as explained in section 12), by visiting the website of the Office of the Australian Information Commissioner.

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|  | | <p>OAIC</p> <ul style="list-style-type: none"> • OAIC home https://www.oaic.gov.au/ |
|---|--|--|