

Last Updated: May 9 2023

1. Introduction

We are the Australian Foundation for Disability (ABN 99 000 112 729) (“**Afford**”, “**us**”, “**we**”, or “**our**”).

This Privacy Policy, together with our website [Terms of Use](#) or any other agreement we have with you, explains how we collect, use and disclose your personal information.

2. Changes To Our Privacy Policy

We may make changes to this Privacy Policy from time to time. Any changes we make will be posted on this website or, where we consider it appropriate, we will communicate the changes to you by email or other means.

The version of this Privacy Policy is current as at the date set out above.

All communications, transactions and dealings with us will be subject to the latest version of this Privacy Policy in force at the time.

3. What Is Personal Information?

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

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

Personal information also includes ‘**sensitive information**’, which is:

- (a) information or an opinion about an individual’s:
 - i. racial or ethnic origin or
 - ii. political opinions or
 - iii. membership of a political association or
 - iv. religious beliefs or affiliations or
 - v. philosophical beliefs or
 - vi. membership of a professional or trade association or
 - vii. membership of a trade union or
 - viii. sexual orientation or practices or
 - ix. criminal record

that is also personal information or

- (b) health information about an individual or
- (c) genetic information about an individual that is not otherwise health information or
- (d) biometric information that is to be used for the purpose of automated biometric verification or biometric identification or
- (e) biometric templates.

4. What Personal Information Do We Collect?

We may collect the following types of personal information:

- identifying information such as your name, gender, date of birth or age
- contact information such as your mailing or street address, billing address, email address, or telephone number
- information about your profession, occupation, employer or job title
- purchase and transaction information, including details about payments to and from you and other details of services you have purchased from us. This information may include bank account and credit card details
- information about how you use our services
- records of our interactions and correspondence with you whether by submitting of a web form, telephone, email, text message, social media or otherwise
- customer service information, including your customer service enquiries and comments
- Government related identifier or information including Medicare number, drivers licence, passport details, and pension card number and
- information relating to your use of our websites or your interaction with our online presences, such as pages you visit, language preferences, webpage interactions and searches you make and information that is automatically collected from your device, including IP address, device type, operating system, unique device identification numbers, browser-type, high level geographic location (e.g. country or city-level location) and other technical information.

See **section 16** below for more information.

If you are referred to us, enquire about our services or use our health services, we may also collect information about you, including your:

- vaccination details, including COVID-19 vaccinations
- allergies
- adverse events
- disabilities

- hospital and clinical history
- family history
- risk factors
- symptoms or diagnosis and the treatment given to you
- medical, psychological, counselling, specialist reports and test results
- prescriptions and other pharmaceutical purchases
- health service plans
- your appointment and billing details
- accident and injury/disease details
- referring health practitioner details
- health fund details
- referrals to or from Commonwealth, state or territory government and non-government agencies such as the National Disability Insurance Agency, the NDIS Quality and Safeguards Commission
- subsidies and rebates you are entitled to
- court orders and
- other sensitive information relevant to our services.

If you apply for a job with us or if you are a volunteer or contractor, we may also collect information about your:

- job application
- professional development history
- salary and payment information, including superannuation details
- health information (e.g. details of disabilities and/or allergies, medical certificates)
- education and qualifications and
- results of reference, working with children and criminal background checks.

If you have or use one of our work email addresses, work computers or work devices, we may also hold and have access to your work emails which may include your private emails and internet browsing history.

CCTV cameras are installed in and around our premises and will record your image. If you do not wish to be recorded, please do not attend our premises.

To help keep you and our personnel safe, we may request and record vaccination status and other COVID-19 related information.

We may also record telephone conversations for quality, compliance and training purposes. If we do, we will inform you before recording.

5. How Do We Collect Your Personal Information?

We collect information in various ways including through the forms you complete online, in person or at our premises, or when you correspond with us by post, telephone, email or otherwise. This includes information you provide when you:

- visit, access or use our websites and social media pages or click on, view or interact with online advertisements
- correspond with us or submit a query or request to us
- complete an application form or purchase order
- use, or request to use, our services
- enquire about or supports, services and/or products
- create an account with us
- subscribe to our newsletter
- request marketing information including in relation to our products and services to be sent to you, or when you respond to marketing information
- make a payment to us and
- give us feedback.

We may also collect personal information from third parties including from:

- your carer, responsible person, guardian or authorised representative
- Commonwealth, state or territory government or non-government agencies
- law enforcement agencies
- medical and/or health professionals who have either worked with you or are currently working with you
- other sources like marketing lists, public information, credit lists and other commercially available information
- our related entities and business partners and service providers;and
- CCTV at our premises.

6. Can I Deal With Afford Anonymously or By Using a Pseudonym?

There are limited circumstances in which you can deal with us anonymously or by using a pseudonym (using a fictitious name). We will let you know the circumstances where this might be possible, and make the necessary arrangements, for example, by providing you with an ID number. In most cases, we will require your contact details.

7. What Happens If We Can't Collect Your Personal Information?

You may choose not to provide us with the personal information we request. If you do not provide us with the personal information we ask for, some or all of the following may happen:

- we may not be able to provide the requested services to you
- we may not be able to provide you with information about the services that you want
- we may not be able to engage you as our employee, contractor or volunteer and
- we may not be able to respond to your request or complaint.

8. For What Purposes Do We Collect, Hold, Use and Disclose Your Personal Information?

We collect, hold, use and disclose your personal information so that we can provide our services to you, or the person in your care, and perform our business activities and functions. This includes:

- keeping our records and your contact details up to date
- complying with any law or a court/tribunal order, or co-operating with a regulator, authority or government department
- providing you with information and updates about our services
- assessing your eligibility (or eligibility of a person in your care) for our services
- registering you as a recipient of our services or as an authorised representative of a recipient of our services
- providing our services to you or the person in your care, or information about our services, including health services, considering your eligibility for our services or otherwise fulfilling our obligations arising from any contracts entered into between you and us
- processing, managing and delivering our services. This includes processing any subsidies, rebates, benefits, entitlements or insurance claims in relation to the services we provide to you
- managing our relationship with you, including dealing with any complaints or credit or debt issues
- notifying you about changes to our Terms of Use or Privacy Policy
- administering and protecting our organisation and our website (including troubleshooting, data analysis, testing, system maintenance, support, reporting, hosting of data, and network, security and fraud protection activities)
- improving our website, products or services, marketing, client relationships and experiences including through analysis and business intelligence techniques
- researching, monitoring and evaluating our services so we can continue to improve the quality and outcomes of our services as well as develop new services

- advocating for the improvement of service quality and outcomes. We do this using de-identified personal information. Where our advocacy involves using your personal information which has not been de-identified, we will always seek your consent prior to sharing this personal information
- meeting our funding, professional, legal and compliance obligations (including our duty of care) in providing you with our services and operating our organisation
- ensuring the safety and security of our employees and other clients
- sending you newsletters, information and updates about services of Afford, or making suggestions and recommendations to you about our and third-party goods, services, events and offers that may be of interest to you, unless you have unsubscribed from these types of message and
- any other purposes which you were informed of at the time of collection or to which you have consented.

If you are a job applicant, volunteer or contractor, we also collect, hold, use and disclose your personal information to consider your application, perform checks including reference checks, working with children checks, and criminal record checks, establish and maintain our relationship with you and to fulfill our duties under this relationship.

9. To Whom May We Disclose Your Personal Information?

We may disclose your personal information to third parties including to:

- third parties such as suppliers, agents, contractors and partners who assist us with our business processes and to provide our products and services including in relation to:
 - IT services
 - providing, managing, supporting and improving our website, products, services and organisation
 - identity and fraud protection services
 - marketing (including direct marketing) and market research services and
 - business analysis and business intelligence services.
- other persons authorised by you or responsible for you (such as your employer, carer, responsible person or guardian)
- regulators, law enforcement and credit and debt collection services
- Commonwealth, state or territory government and non-government agencies such as the National Disability Insurance Agency, and the NDIS Quality and Safeguards Commission

- professional advisers (including lawyers, bankers, auditors, audit assessors and insurers who provide consultancy, banking, legal, insurance or accounting services)
- third parties, including authorities, where we are legally obliged or authorised to disclose your personal information and
- healthcare providers such as medical practitioners and allied health professionals involved in providing the services or other care to you, or the person in your care, or where we refer you to these healthcare providers.

10. Do We Send You Direct Marketing Materials?

We may send you direct marketing communications and information about our services that we consider may be of interest to you. These communications may be sent in various forms, including mail, text message and email.

You can opt-out of receiving these marketing communications from us at any time by contacting us at brand.engagement@afford.com.au or by using opt-out facilities provided in the marketing communications.

11. How Can You Access and Correct Your Personal Information?

You may request access to your personal information held by us.

If you believe that the personal information we hold about you is incorrect, incomplete, out-dated or inaccurate, then you may request us to correct it.

You may also authorise another person to request to access or correct your information on your behalf if, for whatever reason, you are unable to yourself. This authority must be in writing and a copy must be provided to us. The authority must name the person whom you authorise to access your information.

Please make any request to access or correct information to our Privacy Officer in writing at:

Privacy Officer
Afford
3-7 Marianne Place
Minchinbury NSW 277
T: 02 8805 3700
E: privacy@afford.com.au

We aim to respond to requests within a reasonable period, usually within 30 days after we receive the request.

Occasionally it may take us longer if your request is particularly complex or you have made several requests. We will let you know and keep you updated if we cannot respond in 30 days.

12. What Is the Process For Making A Complaint About Privacy?

If you have any questions, concerns or a complaint regarding privacy, please contact our Privacy Officer at:

Privacy Officer
Afford
3-7 Marianne Place
Minchinbury NSW 277
T: 02 8805 3700
E: privacy@afford.com.au

If we fail to respond to your complaint within a reasonable time or if you are dissatisfied with the response that you receive from us, you are entitled to make a complaint to the Office of the Australian Information Commissioner at: [Privacy complaints - Home \(oaic.gov.au\)](https://www.oaic.gov.au)

13. Do We Disclose Your Personal Information to Anyone Outside Australia?

We may disclose your personal information to our third party service providers, some of whom are located overseas (such as in the United States).

14. How Do We Protect and Store Your Personal Information?

We have security measures in place that aim to protect your personal information from misuse, interference, loss and unauthorised access, modification or disclosure.

We are headquartered in New South Wales and provide services around Australia. As a result, we may transfer and hold your personal information outside your state or territory of residence.

15. How Long Do We Keep Your Personal Information?

Subject to our retention requirements for health information outlined below, we will keep personal information for as long as it is needed as set out in this Privacy Policy, or as otherwise required to be retained under law or by a court or tribunal.

In accordance with state-based health information protection laws, we are required to retain your health information for prescribed periods.

16. What Cookies and Other Online Tracking Technologies Do We Use?

We may collect your personal information through the use of cookies. When you access our websites, we may send a 'cookie' (which is a small file containing a unique ID number) to your computer.

We use cookies to recognise you, to learn which of our services you are interested in, to measure website traffic and usage patterns, and to improve our website and services.

We may record IP addresses (that is, the electronic addresses of computers connected to the internet) to analyse trends, administer our websites and collect demographic information.

If you do not wish to receive cookies, you may be able to change the settings in your browser so that your computer does not accept them.

If you disable or refuse cookies, some parts or features of our website may become inaccessible or not function properly.

Some of our cookies are provided by third parties in accordance with their own privacy policies. The information these third parties collect may be transferred to and stored at a location outside your state of residence or Australia.

By accepting cookies, you agree to this transfer, storing or processing of your Personal Information.

17. Third Party Links

Our website may include links to other websites or applications provided by others, including those acting on our behalf.

Clicking on those links or enabling those connections may allow third parties to collect or share data about you in accordance with their own privacy policies.

You acknowledge that we do not control third party websites and we are not responsible for their privacy practices or policies. You should review the privacy policy of any third party and any applicable terms of use when you use their websites and applications.