

PRIVACY POLICY

Roses in the Ocean (RITO)

Policy principle

We believe in:

- Respecting the rights and beliefs of our clients, colleagues and customers
- That the resources of Roses in the Ocean will be used in an ethical way at all times
- Consistently acting in a professional manner
- Ensuring our actions comply with our contracts, considering all legislation in operation and our own internal policies
- Consistently acting in a professional manner
- Always working and behaving lawfully and ethically
- Never being a part of activities that would result in personal gain or inappropriate acquisition

We have therefore established a policy to guide our actions around Privacy.

Policy purpose and scope

The Privacy Policy is made in accordance with the following rationale:

- The obligations as outlined under the Australian Privacy Principles at Schedule 1 of the Privacy Act Privacy Act 1988 (cth).
- Roses in the Ocean is a values based organisation and as such its' operations are built on ethical conduct. Respect for people, including respecting an individual's right to privacy, is a key ethical principle of RITO
- RITO is obliged to protect the privacy of individuals under relevant legislative and contractual obligations. Breaches of privacy may harm RITO's reputation, and in some circumstances may be a breach of the relevant Privacy acts and the *Crimes Act 1914 (Cth)*, punishable by imprisonment.
- The obligations of Confidentiality are an additional part of the way we manage client's information but should not override the obligations under the Privacy Legislation we are bound to.

This policy applies to all RITO Board Directors, committee members, employees and volunteers in Australia including contractors.

Responsibilities

All employees/Volunteers of RITO have a responsibility to ensure that the Privacy Policy is adhered to. Responsibilities are detailed below:

CEO

- Communicate the RITO privacy requirements to volunteers and staff; and
- Consider privacy practices in relation to possible risk management.
- Ensure that all commencing RITO Directors ,employees and volunteers have been fully informed and completed training on the Privacy Policy prior to being given access to any personal information;
- Ensure the Privacy Policy and practices are compliant with Privacy legislation and brief the Privacy Manager where necessary; and

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- Liaise with the Operations Manager who acts as the Privacy Manager in relation to the operation of the Privacy Policy

Privacy Manager

- Action any privacy requirements of the CEO;
- Review the Privacy Policy on an annual basis; and
- Liaise with the CEO in relation to the operation of the Privacy Policy.

All staff and Volunteers

- Adhere to the Privacy Policy and report any breaches of the Privacy Policy to the Privacy Manager.

Definitions

Access

RITO may allow an individual to inspect personal information held by it or give a copy of the personal information to the individual or a person approved by the owner of the information. Access to personal information is to be given in accordance with the Privacy legislation.

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

Sensitive Information A form of personal information which includes, but is not limited to, information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affirmations, philosophical beliefs, membership of a professional or trade association, sexual preferences or practices, criminal record or health information about an individual.

It also includes genetic information about an individual that is not otherwise health information; or biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or biometric templates.

Services include training programs and events.

Policy

RITO ("RITO", "We", "Our" or "Us") is committed to protecting your personal information. We are bound by the Privacy Act 1988 (Cth) and Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Privacy Act), including the Australian Privacy Principles (APPs).

This policy sets out how we manage your ("you" or "your") personal health and sensitive information.

We will take steps to manage your information in an open and transparent way. We have practices, procedures and systems in place to ensure that we comply with all relevant legislation and are able to deal with any related inquiries or complaints by you

Before requesting your information we will ensure you understand the following points:

- (a) Who we are and how you contact us,
- (b) that you are able to request access to the information,
- (c) the purposes for which the information is collected,
- (d) the persons to whom (or the types of persons to whom we usually disclose your information to,
- (e) any law that requires the particular information to be collected if relevant,
- (f) the main consequences (if any) for you if all or part of the information is not provided.

Management of your information

We may collect, use and store your information in the provision of our services and in the course of managing our contracts with customers. The information that we collect and hold about you depends on your interaction with us. Generally, we will collect and hold your information for the purposes of:

- Confirming appointments;
- Determining your eligibility for service;
- Service provision;
- Providing you with information about other services we offer that may be of interest to you;
- Managing the quality of our services including seeking your feedback on our services; and
- Facilitating our internal business operations.

Wherever possible, we will collect your information directly from you, usually by verbal interaction or through written correspondence with you. There may however be some instances where your personal information will be collected indirectly because it is unreasonable or impractical to be collected directly. For example, you may be nominated as the next of kin by someone who seeks our services.

We will not use the information you have provided for any other purpose than that you provided it for.

If you apply for an advertised position with RITO, your personal information will be used solely for the role for which you have applied unless you authorise it to be held on file for future roles. If you are unsuccessful in securing that role, and you do not allow it to be held on file your information will be securely destroyed within 60 days of the completion of the recruitment process.

If your personal information is received in an unsolicited way by RITO, for example through email, letter, business card, provision of resume, or any other method, unless you tell us otherwise, we will assume that we have your consent to retain and use your personal information for the purpose that it was provided. In these instances we may securely

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store your personal information and refer back to it for the purpose that it was provided at a future date. If you have previously provided RITO with your personal information in an unsolicited way and no longer wish for us to securely store your information for the purpose that it was provided, you can contact us at Privacy@rosesintheocean.com.au to instruct us to securely destroy the information.

Where you provide your credit card or debit card details to satisfy payment of an account that is due and payable for services that RITO has provided to you, these details are directly entered into the eftpos machine for each transaction, and are not stored by RITO in any way.

If you access RITO's website, we may collect additional personal information about you in the form of your IP address or domain name.

Your information will be kept in Australia. Any hard copy records we hold which contain your information will be kept in secure storage. We may need to transfer your information to our staff or sub-contractors in order to provide you with our services. Where this is necessary, the relevant information will only be accessible to the extent necessary. In addition, any electronic records containing your information are kept in a secure Cloud deployed information technology environment, or on secure local servers. We engage third party service providers to assist us with our IT requirements. Third party service providers do not have any access to your personal or sensitive information stored in our systems. Some of our sites, and those of our subcontractors, have surveillance equipment in operation for security purposes. You may be filmed entering and/or leaving those locations but RITO does not actively undertake these functions and cannot respond to any requests or complaints about them.

We will not provide any identifiable personal information to any third party without your prior informed, written consent.

Under the legislation you are entitled to obtain, review and correct the information we hold on you. If you wish to obtain, review and correct any information we hold on you, you must put the request in writing to Privacy@rosesintheocean.com.au. We will contact you within 3 business days to acknowledge your request and have responded to you about the request within 10 business days.

When reviewing your request we will consider the nature of the information we hold and how best to communicate it with you. We may seek to confirm your identity before providing you with the information to ensure it is going to the correct person.

If we deny your request to access, obtain, review and correct your personal information we will provide you our reasons in writing and according to the relevant legislation we are relying upon.

If we grant your request we will be able to charge you. If we intend to charge you for the access then we will advise you in writing what the charge is for, how it is calculated and discuss how payment is to be made. We will not charge you for making a request and our acknowledging that request and any decision we make on your request.

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We will only disclose your information to other parties when it is considered necessary to do so, and in accordance with the relevant legislation or other relevant guidelines relating to managing risk of harm to self or others. We also destroy your information in hard copy form in accordance with relevant legislative requirements. Generally this requires us to retain and securely store your information for a period of seven years. You can contact our office by email at Privacy@rosesintheocean.com.au to seek access to your information and/or seek correction of information we hold about you. We are unable to destroy your personal information held in the Electronic database.

Complaints

If you think we have breached our privacy obligations to you, you can make a complaint to our Privacy Officer. Your complaint must be in writing and can be emailed to our Privacy Officer at Privacy@rosesintheocean.com.au. Our Privacy Officer will respond to you within 30 days of receiving your complaint. You may also make a complaint to the Office of the Australian Information Commissioner.

Review and Comments

We review this policy annually to ensure we continue to comply with our obligations. You are invited to comment on this policy by contacting us at Privacy@rosesintheocean.com.au. Your comments will be considered in the review of the policy. We encourage you to check the RITO website regularly for any updates to RITO's privacy policy.

Document Control, Version Control and Related Documents

Version Control

Version	Description of change	Person making change	Date changes made	Date for next review
V0.1	Draft Policy	Mark Davis	120516	
V1	Release of Policy	Mark Davis	040118	040120
V1.1	Minor changes	Mark Davis	310118	040120

The latest version is due for revision 12 months after the date of the last change.
The document owner is responsible for the revision.

Related Documents

The table below lists any documents that support this policy.

Document

- Code of Conduct