



# PRIVACY POLICY

Effective Date: January 2024







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### Purpose

Roses in the Ocean Ltd ABN 36 652 550 966, and our associated entity Suicide Prevention C.A.R.E Ltd ABN 36 152 499 075 (together "Roses in the Ocean", "us", "we" and "our") are committed to the collection, holding, use and disclosure of your personal information in accordance with the requirements of the *Privacy Act 1988* (Cth) and associated Australian Privacy Principles (together, **Privacy Laws**).

This Privacy Policy describes how we manage the personal information we collect, hold, use and disclose from time to time, including in connection with our website and services available at rosesintheocean.com.au (the **Website**). It also explains how you can seek access to and correction of the personal information we hold about you, and how you can make an enquiry or complaint about our handling of your personal information.

### Our commitment to transparency

Your privacy is important to us. We are committed to providing the information you need to make informed choices about the ways you use the Website and our services, make donations or otherwise engage with us.

### Our Feedback Policy

Roses in the Ocean is dedicated to continually improving the services we offer and work that we do. We value and encourage all feedback. Please submit any comments, complaints or feedback in writing to: feedback@rosesintheocean.com.au.

# What kinds of personal information do we collect?

"Personal information" means information about an identified or identifiable individual. Examples of personal information include your name, your mobile number, your email address and your photograph.

"Sensitive information" is personal information relating to an individual's ethnic or racial origin, political opinions or membership of a political association, religious or philosophical beliefs, trade union or professional association membership, criminal record, sexual orientation or practices, as well as health information, genetic and biometric information.

The types of personal information that we collect and hold about you will depend on the nature of your engagement with us. We will only collect your personal information where it is reasonably necessary for us to pursue one or more of our functions or activities, or where we are required to collect the information by law.

When you use our Website or our services or otherwise engage with us, we may collect details such as:

- your contact details, including your name, email address, telephone number, and physical address;
- your personal details, including details of your age or date of birth, current and previous employment, education and marital status;
- with your consent, your ethnic or cultural background, political affiliations, marital status, and sexual orientation;
- the results of reference and background checks (including criminal history, with your consent);





- your image, if you have provided your consent to your photograph being taken at our workshops or events; and
- your IP address or MAC address when you use our Website (and associated details such as the city associated with your IP or MAC address, the date and time of your Website visit, the pages viewed, the URL of the Website you viewed before our website and the type of browser you use).

Given the nature of our organisation, we may also collect sensitive information from you in some circumstances (such as your criminal history, health information, ethnic or cultural background, political affiliations and sexual orientation). In accordance with Privacy Laws, we will only collect your sensitive information with your consent, and if the collection is reasonably necessary for us to pursue one or more of our functions or activities.

### Anonymity

You have the option of interacting with us anonymously or using a pseudonym if you feel more comfortable dealing with us that way. For example, if you contact us by telephone with a general question, we will not ask for your full name unless we need it to answer your question or otherwise provide our services and engage with you further.

### Information of third parties

If you want to share a story that includes another person's lived experience of suicide in which that person will be identifiable, you must seek written permission from the individual or next of kin first and let them know about our Privacy Policy. If you share a story without obtaining the written consent of the individual or next of kin, upon becoming aware of the lack of consent, Roses in the Ocean will remove the post and destroy any other records of the relevant information. Some people may not want their experience made public. It is important to consider the impact and respect the wishes of others affected by the same story as you.

#### **Donations**

If you make a donation to us, we may also collect your credit card details in addition to information of the type set out above.

In these circumstances, we may also collect other information such as:

- your preferences for receiving further information and communications about our programs, workshops, campaigns or activities;
- your title at work, the department you work for, company information or marketing spend; and
- demographic information about you and/or other unique identifiers in order to provide you with a more personalised experience, or to verify your passwords.

### How do we collect your personal information?

We may collect and use your personal information if you:

- deal with us over the phone, via email or in person;
- call or use our SP Peer CARE Companion Warmline service:
- participate in public or closed surveys, questionnaires or events:
- register to participate in our workshops, either as a participant or facilitator;





- register for face-to-face or digital events (such as webinars);
- donate to Roses in the Ocean: or
- apply for a position with us either as an employee, volunteer or contractor.

Wherever possible, we will try to collect personal information from you directly, rather than from another person or source, unless it is unreasonable or impractical to do so.

### How do we use your personal information?

We may collect your personal information for a number of purposes. We will use and disclose your personal information only for the purposes for which it was collected, and as otherwise set out in this Privacy Policy. This includes to:

- provide you with the information or resources you have requested from us;
- provide you with support and refer you to other support services (including emergency services and crisis lines) when you call or use our Suicide Prevention services;
- involve you in programs, workshops, campaigns, research, activities or other initiatives undertaken by Roses in the Ocean and organisations associated with Roses in the Ocean;
- reporting to funding organisations and stakeholders in relation to our activities, and comply with our legal and regulatory obligations;
- receive and process your donation;
- show your name and the amount of any donation or sponsorship you may make on our Website (unless you choose a private or anonymous donation);
- register you to hold a fundraising event or for you to assist us as a volunteer;
- send you emails about our programs, workshops, campaigns or activities (if you have consented to this);
- improve the emails that are sent to you and to improve the personalisation, services, programs, content and resources that may be offered to you;
- enable like-minded organisations to contact you with information that may be of interest to you (if you have consented to this);
- invite you to participate in surveys and provide feedback to us; or
- if you are applying to work with us, to assess your application, and if you are employed or engaged to work with us, to manage our ongoing employment or engagement relationship with you and comply with our obligations as an employer.

If you do not provide the personal information requested by us, we may not be able to provide our services to you or continue our engagement with you.

# Who might Roses in the Ocean disclose your personal information to?

We do not share or disclose the personal information that we collect, except as specifically disclosed in this Privacy Policy.

Your personal information may be provided to third parties where they provide services that relate to the purpose for which the personal information was collected.

For example, in certain circumstances we may disclose your personal information to:

• the service providers that host our Website servers:





- other support services (including emergency services and crisis lines) we may refer you to when you call or use our SP Peer CARE Companion Warmline service;
- our service delivery partners;
- marketing service providers;
- other like-minded charitable organisations;
- professional advisors such as accountants, auditors and lawyers; and
- Government Departments of Health who provide funding for our services.

Otherwise, we will only disclose your personal information if:

- you have consented to the disclosure;
- it is necessary to prevent injury to life or health; or
- it is permitted, required or authorised by or under an Australian law or a court/tribunal order.

In certain circumstances, we may also use and disclose de-identified information (which can no longer be used to identify you) for the purposes of:

- compiling statistical information about our services or our organisation more broadly; or
- undertaking research.

### Cookies and similar technologies

We use "cookies" (small files sent to and stored by your browser on your device) to collect information and support certain features of the Website, and other web tracking/analytic tools that generate statistics about traffic to our Website.

For example, we may use these technologies to:

- collect information about the ways you use the Website which pages you visit, which links you use, and how long you stay on each page;
- recognise when you return to the Website; and
- improve our services, programs, content and resources.

Generally, the information we collect using these web technologies does not identify you personally.

If you do not wish to receive cookies, you can set your browser so that your computer does not accept them.

Our Website also uses marketing automation tools that send communications (such as email or SMS) using a number of different services.

Each service uses tracking technologies primarily to understand what subjects are interesting to you by monitoring whether you open emails and follow links. This information is then used to improve the messages that are sent to you and to improve the services, programs, content and resources that are offered to you.

### Direct marketing communications

If you register your email with us, from time to time, we may send you emails about our programs, workshops, campaigns or activities. Other like-minded organisations may also contact you with information that may be of interest to you.

You may opt-out of receiving these communications from us at any time by using any of the opt-out facilities provided in the communications or by emailing enquiries@rosesintheocean.com.au.





### Storage and security of personal information

We take reasonable steps (including reasonable administrative, physical and technological measures) to protect the confidentiality and security of your personal information. Your personal information is maintained in a secure environment, which can only be accessed by authorised personnel.

We hold most personal information electronically in our IT systems and databases, but also use third party service providers to store some personal information.

Unfortunately, no website, server or database is 100% secure. Therefore, we cannot guarantee its absolute security.

#### Breach

Notwithstanding the reasonable steps taken to keep information secure, breaches may occur. In the event of a security or data incident we have in place procedures to promptly investigate the incident and determine if there has been a data breach that would require notification. If it is, we will notify affected individuals and the Office of the Australian Information Commissioner ("OAIC") in accordance with Privacy Laws.

# Does my personal information leave Australia?

Roses in the Ocean processes and stores personal information in Australia.

We will only send or disclose your personal information outside Australia in accordance with Privacy Laws, including if we are authorised or required to do so by law.

### Links to other sites

The Website may provide links to other websites operated by third parties. We are not responsible for the privacy practices, operation, or the content of such websites. You should check the privacy policy of the third-party website before providing your personal information to those websites.

# Access to and correction of personal information

You have rights to:

- request access to the personal information we hold about you;
- ask us to update or correct any personal information we hold about you that is inaccurate, incomplete, or out of date; and
- opt out of receiving direct marketing communications from us.

You can take any of these steps by contacting our Privacy Officer using the contact details below.

If you request access to your personal information or ask us to correct or update the personal information we hold about you, we may need to verify your identity. There is no charge or cost for making a request for access or correction, however we may charge you a fee for providing access.

In some circumstances, there may be a valid reason for us to refuse your request to access or correct your information, under Privacy Laws. If we do refuse your request, we will notify you of the reasons for our decision.





### Changes to the Privacy Policy

This Privacy Policy may change from time to time. Any updated versions of this Privacy Policy will be posted on the Website and will be effective from the date of posting.

This Privacy Policy was last updated in January 2024.

### Enquiries or complaints

If you have any questions or concerns about this Privacy Policy or our privacy practices, please contact us at:

Roses in the Ocean

Suite 102, Level 1, 33 Longland Street

Newstead, Brisbane QLD 4006

Phone: 1300 411 461

If you are not satisfied with our response you are entitled to contact the Australian Information Commissioner, at <a href="mailto:enquiries@oaic.gov.au">enquiries@oaic.gov.au</a> or on 1300 363 992, or in writing addressed to the Director of Compliance, Office of the Australian Information Commissioner, GPO Box 5218, Sydney NSW 2001. More information is available on the OAIC's website at <a href="https://www.oaic.gov.au">https://www.oaic.gov.au</a>.

POLICY DETAILS	
Policy Title:	Privacy Policy
Policy Owner:	Operations
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