

# Privacy Policy

P-001

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## Purpose and scope

The Behaviour Change Collaborative (The BCC) (ABN 54 157 706 646) ('we', 'us' and 'our') is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your personal information.

We have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The APPs govern the way in which we collect, use, disclose, store, secure and dispose of your personal information.

A copy of the APPs may be obtained from the website of The Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au).

We may revise this Privacy Policy from time to time by updating this page. The revised Privacy Policy will take effect when it is posted on our website.

## Personal information

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

- Whether the information or opinion is true or not
- Whether the information or opinion is recorded in a material form or not

The types of personal information we collect may include your name, date of birth, gender, contact information, credit/debit card information.

We collect personal information from people who are connected to our operations – including employees, sponsors, research study participants, recipients of services, participants in advocacy campaigns, project participants, health professionals, suppliers, volunteers and service providers.

## How do we collect personal information?

Where possible, we will collect your personal information directly from you. This may be in person, on the telephone or online (for example, if you sign up for an event or seminar online). We also collect information you submit when interacting with our website (for example, when you sign up to an e-newsletter or complete our contact form).

We don't guarantee website links or policy of authorised third parties.

We collect your personal information for the primary purpose of providing our services to you, providing information to our clients, and marketing our products and services. We may also use your personal information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure.

When we collect personal information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.



## Third parties

Where reasonable and practicable to do so, we will collect your personal information only from you. However, in some circumstances we may be provided with information by third parties.

## Why do we collect personal information?

We may collect your personal information for a number of purposes, including but not limited to:

- To communicate with you about products, services, causes and upcoming events
- To provide you with information about our services, and to evaluate and report on these services
- To conduct and/or fund research projects.
- Prospective employment, volunteering or internship opportunities
- General communications in relation to our activities, to verify your identity, to improve and/or evaluate our services, and to comply with relevant laws

## Sensitive information

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law

## What happens if you do not provide this information?

If you do not provide some or all of the personal information requested, we may not be able to offer you services or provide you with information about other events, programs, causes and projects.

## Website usage information and cookies

When you access our website, we may use software embedded in our website (such as JavaScript) and we may place cookies on your computer or other device to collect information about which pages you



view and how you reach them, what you do when you visit a page, the length of time you remain on the page, and how we perform in providing content to you.

A cookie does not identify individuals personally, but it does identify computers. You can set your browser to notify you when you receive a cookie, and this will provide you with an opportunity to either accept or reject it in each instance.

You can also delete cookies that have already been set. If you wish to restrict or block web browser cookies which are set on your device then you can do this through your browser settings.

We may gather your IP address as part of our business activities and to assist with any operational difficulties or support issues with our services. This information does not identify you personally.

We use Google Analytics features based on Remarketing, Google Analytics Demographics and Interest Reporting. These features use first-party and third-party cookies to inform and optimise content based on your past visits to our site.

Google Analytics informs us of how visitors use our site based on your browsing habits. Google also receives this information as you browse our site and other websites on the Google Display Network using Remarketing.

If you would like to opt-out of customised Google Display Network services and Google Analytics for Display Advertising you can modify Ad Settings. You can also use the Google Analytics Opt-out Browser Add-on, so you are not tracked in Google Analytics.

## Access to your personal information

You may access the personal information we hold about you and to update and/or correct it, subject to certain exceptions and subject to applicable privacy laws.

If you wish to access your personal information, please contact us in writing clearly identifying the type(s) of information requested.

We will deal with your request to provide access to your personal information within 30 days and you agree we may charge you our reasonable costs incurred in supplying you with access to this information.

In order to protect your personal information, we may require identification from you before releasing the requested information.

Your rights to access personal information are not absolute and privacy laws dictate that we are not required to grant access in certain circumstances, including:

- Access would pose a serious threat to the life, safety or health of any individual, or to public health or public safety
- Access would have an unreasonable impact on the privacy of other individuals
- The request is frivolous or vexatious
- Denying access is required or authorised by a law or a court or tribunal order
- Access would be unlawful
- Access may prejudice commercial negotiations, legal proceedings, enforcement activities or appropriate action being taken in respect of a suspected unlawful activity or serious misconduct



If we refuse to grant you access to your personal information, we will provide you with reasons for that decision (unless it is unreasonable to do so) and the avenues available for you to complain about the refusal.

## Opting out of marketing communications

Where we use your personal information to send you marketing and promotional information by post, email or telephone, we will provide you with an opportunity to opt-out of receiving such information.

By electing not to opt-out, we will assume we have your implied consent to receive similar information and communications in the future. We will always ensure that our opt-out notices are clear and easy to take up.

If you do not wish to receive direct marketing communications from us, please email us at [hello@thebcc.org.au](mailto:hello@thebcc.org.au).

## Disclosure

Your personal information may be disclosed in a number of circumstances, including the following:

- Third parties for research projects being undertaken with The BCC
- Third parties for marketing purposes
- External support services
- Contractors and service providers who assist us with delivery of services, including mailing houses, printers, information technology services providers (including offshore cloud computing service providers), database contractors and telemarketing agencies
- Where required or authorised by law

## Where is your personal information stored?

We take all reasonable steps to protect all of the personal information we hold from misuse, interference and loss, and from unauthorised access, modification or disclosure. Your personal information will be stored on a password protected electronic database, which may be on our database, a database maintained by a cloud hosting service provider or other third-party database storage or server provider.

Hard copy information is generally stored in our office, which is secured to prevent entry by unauthorised people. As soon as practicable, we transfer hard copy information to electronic format, and then destroy the hard copy, unless we are required by law to keep it.

Where personal information is stored with a third party, we require those third parties to maintain the security of the information. We take reasonable steps to protect the privacy and security of that information, but we are not liable for any unauthorised access or use of that information. Your personal information will stay on the database indefinitely until you advise you would like it removed unless we de-identify it or destroy it earlier in accordance with privacy law requirements.



When your personal information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your personal information. However, most of the personal information is or will be stored in client files which will be kept by us for a minimum of seven years.

## Maintaining the quality of your personal information

It is an important to us that your personal information is current. We will take reasonable steps to make sure that your personal information is accurate, complete and up to date.

If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

We will take reasonable steps to verify your identity before granting access or making any corrections to or deletion of your information. We also have obligations to take reasonable steps to correct personal information we hold when we are satisfied that it is inaccurate, out-of-date, incomplete, irrelevant or misleading for the purpose for which it is held.

If you wish to update your personal information, please contact us at The Behaviour Change Collaborative, Suite 2, Ground Floor, 1318 Hay Street, West Perth WA 6005, or email [hello@thebcc.org.au](mailto:hello@thebcc.org.au).

## Payment processing

We use a Secure Socket Layer (SSL) certificate for encrypting your credit card and debit card numbers, your name and address so that they cannot be viewed by any third party over the internet.

## International disclosures

We use data hosting facilities and third-party service providers to assist us with providing our goods and services. As a result, your personal information may be transferred to, and stored at, a destination outside Australia.

Personal information may also be processed by staff or by other third parties operating outside Australia who work for us or for one of our suppliers, agents or partners. We take such steps as are necessary and practicable in the circumstances to ensure that any overseas third-party service providers we engage do not breach the APPs.

## Policy updates

This policy may change from time to time and is available on our website.



# Complaints

If you have any queries or would like to make a complaint relating to our Privacy Policy or the manner in which we handle your personal information, please email [hello@thebcc.org.au](mailto:hello@thebcc.org.au), or write to us at Suite 2, Ground Floor, 1318 Hay Street, West Perth WA 6005.

We endeavour to respond to complaints and queries within fourteen days. If you are dissatisfied with our response, you may refer the matter to The Office of the Australian Information Commissioner (see [www.oaic.gov.au](http://www.oaic.gov.au)).

