# **Zephyr Education Inc**

## **Privacy policy**

### 1. Purpose

Zephyr Education Inc (Zephyr, we, our, us) recognise the importance of protecting the privacy and the rights of individuals over their personal information. This document is our privacy policy and it tells you how we collect and manage your personal information.

### 2. Objective

We respect your rights to privacy under the *Privacy Act 1988 (Cth) (Act)* and we aim to comply with all of the Act's requirements concerning the collection, management and disclosure of your personal information. With an annual turnover of significantly less than the legislated threshold of \$3m our adoption of this policy is voluntary. Accordingly, we have a commitment to privacy and the safeguarding of all personal information.

Any personal information provided by you to Zephyr will be protected. Generally, we will only use or disclose your personal information for the purpose for which it was collected. We will only use and disclose your information where the use or disclosure is lawful.

### 3. Definition of personal information

#### What is your personal information?

When used in this privacy policy, the term "personal information" has the meaning given to it in the Act. In general terms, it is any information that can be used to personally identify you. This may include your name, address, telephone number, email address and profession or occupation. If the information we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

### 4. Collection and use of personal information

#### What personal information do we collect and hold?

We collect personal information from a wide variety of individuals including:

- members;
- volunteers;
- donors;
- DV victims and families in receipt of our goods and services;
- staff of DV shelters / support organisations that engage with us on behalf of victims and their families;
- staff of suppliers and educational institutions.

We may collect the following types of personal information:

- name;
- mailing or street address;
- email address;
- telephone number;
- facsimile number;
- age or birth date;
- profession, occupation or job title;
- details of the products and services you have acquired from us or which you have enquired about, together with any additional information necessary to deliver those products and services and to respond to your enquiries;
- any additional information relating to you that you provide to us directly through our website or online presence, through our representatives or otherwise.

We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how users use our website.

#### How do we collect your personal information and how is it used?

Personal information from members is provided via the membership application form and used to maintain contact as required by law and to engage with members, as necessary. Contact details of an emergency contact are also obtained.

Volunteers complete a details sheet providing contact information for themselves and an emergency contact to enable work arrangements to be managed.

Donors provide personal information sufficient to enable tax deductable receipts to be forwarded.

Personal information about DV victims and their families is obtained when staff of DV shelters / support organisations make enquiries about or lodge requests for assistance on behalf of these individuals. This enables us to provide the goods and services approved as necessary to support these individuals.

Staff of DV shelters / support organisations, suppliers and educational institutions supply personal information to the extent necessary to enable us to transact / interact with them.

We may also collect your personal information through the use of cookies. When you access our website, we send a "cookie" (which is a small summary file containing a unique ID number) to your computer. This enables us to recognise your computer and greet you each time you visit our website. We also use cookies to measure traffic patterns, to determine which areas of our website have been visited and to measure transaction patterns in the aggregate. We use this to research our users' habits so that we can improve our online products and services. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them.

### 5. Disclosure of your personal information

Your personal information will not be shared, sold, rented or disclosed other than as described in this policy. All volunteers sign a confidentiality declaration giving an undertaking not to divulge confidential information to any unauthorised person.

We do not provide your personal information to other organisations for the purposes of direct marketing. In the normal course of events, we do not disclose personal information to organisations outside of Australia.

We may disclose your personal information to:

- our volunteers, contractors or service providers for the purposes of carrying out our charitable purposes, fulfilling requests by you, and to otherwise provide products and services to you;
- professional advisors such as accountants, auditors, solicitors, business advisors and consultants; suppliers and other third parties with whom we have commercial relationships, for conducting our charitable functions; and
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority.

### 6. Accessing and correcting your personal information

You have a right to access any personal information that we may hold about you, including a right of correction of your information where an error is found. We will not charge a fee for you to access or correct your personal information. Access may be sought by contacting the Secretary as outlined below and we will try to provide you with suitable means of accessing it for example, by mailing or emailing it to you.

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others. If that happens, we will give you written reasons for any refusal.

### 7. Complaining about a breach of privacy

If you believe that your privacy has been breached, please contact our Secretary as outlined below and provide details of the incident so that we can investigate it. We request that complaints about breaches of privacy be made in writing, so we can be sure about the details of the complaint. We will treat your requests or complaints confidentially. Our representative will contact you within a reasonable time after receipt of your complaint to discuss your concerns and outline options regarding how they may be resolved. We will attempt to confirm as appropriate and necessary with you, your understanding of the conduct relevant to the complaint and what you expect as an outcome.

We will inform you whether we will conduct an investigation, the name, title, and contact details of the investigating officer and the estimated completion date for the investigation process. After we have completed our enquiries, we will contact you, usually in writing, to advise the outcome and invite a response to our conclusions about the complaint. If we receive a response from you, we will assess it and advise if we have changed our view.

#### 8. Security

We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure. Information about the specific whereabouts of DV victims and their families is rarely collected and if so is either deleted or tightly concealed with access only on a strict need to know basis. We may hold your information in either electronic or hard copy form. As our website is linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any personal information or other information which you transmit to us online is transmitted at your own risk.

### 9. Contacting us

If you have any questions about this privacy policy, any concerns or a complaint regarding the treatment of your privacy or a possible breach of your privacy, please contact our Secretary as below.

Secretary – Anthony Johnson

Email - admin@zephyreducation.com.au

Post - PO Box 6096, FAIRFIELD GARDENS, QLD, 4103

Phone - 0478 725 658

Approved by resolution of the Zephyr Education Inc management committee on 17/03/2021

#### Anthony JOHNSON

President / Secretary