



## PRIVACY POLICY

<b>Policy Number</b>		<b>Version</b>	
<b>Drafted by</b>	CEO	<b>Approved by Board on</b>	February 2023
<b>Responsible person</b>	CEO	<b>Review date</b>	
		<b>To be reviewed</b>	

### 1. PRIVACY POLICY STATEMENT

The VLGA is committed to the highest standards of good governance and this policy outlines our ongoing obligations in respect of how we manage the Personal Information of those whose information we hold.

The VLGA is bound by 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).

### 2. DEFINITIONS

#### *Personal Information*

Personal information is information or an opinion relating to an individual that can be used to identify an individual. The information or opinion will still be personal information whether or not it is trust and whether or not we have kept a record of it.

#### *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, sexual preferences or practice, membership of a trade union or other professional body, criminal record or health information.

### 3. WHAT KINDS OF PERSONAL INFORMATION DO WE COLLECT AND HOW DO WE COLLECT IT?

Types of personal information we collect depends on the nature of our engagement with you. Examples of personal information we may collect include:

- a) the name, contact details, attendance, photographs, images and video and audio recordings of attendees at VLGA meetings, programs and events; whether online or in person;
- b) the name and contact details of individuals who seek employment with VLGA including employment experience, qualifications and other information provided by applicants;
- c) the name and contact details of individuals who purchase memberships, goods or services from us;
- d) the name and contact details of individuals (including members) who contact VLGA seeking information or assistance;

- e) credit card and bank account information for payment of invoices, event tickets and training courses/professional development activities;
- f) the name and contact details of individuals that are members of Reference and Advisory groups;
- g) the name and contact details of individuals who represent VLGA on external committees;
- h) the name and contact details of individuals who access information made available by us through electronic means such as the internet;
- i) the name of individuals and entities that are classified as related parties to our key management personnel (KMP);
- j) the information preferences nominated by individuals and expressed to us in writing; and
- k) historical financial data about specific transactions entered into between individuals and the VLGA.

This Personal Information is obtained in many ways including correspondence, by telephone, by email, via our website [www.vlga.org.au](http://www.vlga.org.au), from your website and membership database, from media and publications, from other publicly available sources, from cookies and from third parties. We cannot guarantee website links or policy of authorised third parties.

#### **4. PURPOSE FOR COLLECTING, USING AND DISCLOSING PERSONAL INFORMATION**

We collect your Personal Information for the primary purpose of providing our services to you, providing information to our clients and marketing. Personal Information is collected directly from individuals.

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.

Depending on the nature of your engagement with us, this may include:

- a. providing our services including holding and managing events, providing professional development/training (including mentoring), conducting advocacy and lobbying (including making nominations to external committees), providing legal and policy advice, providing industrial advice and representation, and conducting executive recruitment and performance assessment (including assessing whether you meet some of our course requirements for our professional development services);
- b. producing audio-visual online programming material and publishing images or recordings of you on our digital services where you may be a presenter, guest, audience member, event attendee (or otherwise) in our online recorded programs and events;
- c. managing our networks;
- d. managing our online groups;
- e. assessing your application for employment with VLGA;
- f. assessing applications for our grants and awards, including those which we may administer on behalf of the State or Federal Governments;
- g. processing your payments;

- h. communicating with you, including sending you newsletters, other online marketing collateral and media releases;
- i. processing a request you have made to us;
- j. sending you our newsletters, email/marketing communications and media releases;
- k. informing you about our events, products or services (including sending you correspondence on our similar events, products and/or services);
- l. managing government grants and reporting obligations under those grants;
- m. responding to media enquiries;
- n. improving the services and products we offer;
- o. responding to complaints, inquiries or requests;
- p. complying with our legal obligations; and
- q. otherwise better meeting your needs and preferences.

We may also use or disclose your personal information for another purpose if:

- a) you consent; or
- b) you would reasonably expect us to use or disclose the personal information for that other purpose and the other purpose is related to the original purpose of collection (for example, sending you correspondence on similar events and/or services); or
- c) it is otherwise required or authorised by law.

#### *Direct Marketing*

We may use your personal information for the purpose of direct marketing only where:

- a) we have collected the personal information from you,
- b) you would reasonably expect us to use or disclose the information for that purpose; and
- c) you have not made a request to cease the communication.

An individual is entitled to request not to receive direct marketing communications from us by contacting us. We are obliged to comply with any opt out request.

#### **5. [IF APPLICABLE] CONSEQUENCES IF PERSONAL INFORMATION IS NOT COLLECTED**

If personal information is not provided to the VLGA, there may be certain consequences, including:

- a) the VLGA may be unable to properly investigate or resolve an individual's complaint;
- b) a different level of service will be provided to the individual;
- c) an individual may be ineligible to receive certain benefits; and
- d) an individual may not receive pertinent information relating to their membership entitlements.

#### **6. SENSITIVE INFORMATION**

It may be necessary in some circumstances for VLGA to collect sensitive information about you in order to provide specific services or for recruiting purposes.

Sensitive information will be used by us only:

- a) for the primary purpose for which it was obtained; or

- b) for a secondary purpose that is directly related to the primary purpose; and
- c) with your consent; or where required or authorised by law.

## **7. 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. In such a case we will take reasonable steps to ensure that you are made aware of the identity of the third party, and the information provided to us by the third party. (e.g., A Council representative provides a full list of representatives from a Council to confirm a group booking for an The VLGA event or professional development activity).

## **8. DISCLOSURE OF PERSONAL INFORMATION**

Your Personal Information may be disclosed in a number of circumstances including the following:

- a) third parties where you explicitly or impliedly consent to the use or disclosure; and
- b) where required or authorised by law.

We may disclose your personal information to:

- a) third parties who may assist us in providing our products or services, including customer support, postal and delivery service providers;
- b) our own professional advisors, contractors, related body corporates; and
- c) our insurance providers.

## **9. SECURITY OF PERSONAL INFORMATION**

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure. Your personal information may be held in either or both hard copy and/or electronic form in secure databases that are accessible only by authorised staff. We take steps to maintain physical security over records held in hard copy form.

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 7 years.

## **10. 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. If you wish to access your Personal Information, please see our contact details at the end of this policy and contact us in writing, by email or phone.

VLGA will not charge any fee for your access request but may charge an administrative fee for providing a copy of your Personal Information.

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

## **11. MAINTAINING THE QUALITY OF YOUR PERSONAL INFORMATION**

It is important to us that your Personal Information is up to date. 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.

## **12. POLICY UPDATES**

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

## **13. PRIVACY POLICY COMPLAINTS AND ENQUIRIES**

If you have any queries or complaints about our Privacy Policy please contact us at:

VLGA

PO Box 4089

Richmond Vic 3121

[vlga@vlga.org.au](mailto:vlga@vlga.org.au)

(03) 9349 7999