

## Privacy Policy

We take your privacy seriously and are committed to managing your personal information in accordance with the Australian Privacy Principles contained in the *Privacy Act 1988 (Cth)* and the Information Privacy Principles set out in the *Information Privacy Act 2009 (Qld)*. Our staff are bound by these laws as well as our Code of Conduct to maintain confidentiality and comply with our Privacy Policy.

This Privacy Policy explains how we manage your personal information and sensitive information when you interact with us.

### Definitions

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**'our', 'we' or 'us'** refers to DVConnect Limited ACN 101 186 476 and our services.

**'you' or 'your'** refers to anyone from whom we collect information.

**Personal information** means information or an opinion about an individual who can reasonably be identified from that information or opinion, whether true or not, and whether or not recorded in a material form (e.g. your name, phone number, date of birth).

**Sensitive information** means information or an opinion about an individual including health and genetic information, racial or ethnic origin, religious or philosophical beliefs, criminal record, political opinions or associations, trade union membership or associations, sexual orientation or practices, and some biometric information.

**Aggregated data** is information that has been combined with other data in a way that prevents identification of individuals, such as statistical data or trends

**Anonymously** is where you may deal with us without providing any information that could identify you either at the time of the interaction or subsequently.

**Pseudonym** is where you may deal with us by using a name, term or descriptor that is different to your actual name.

### Collection of your personal information

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#### Why we collect your personal information?

We collect personal information so that we can provide you with the best and most suitable service. We generally only collect personal information necessary to carry out our functions and activities. More information on our services is available on our website: <https://www.dvconnect.org/>.

#### How do we collect your personal information?

We will usually collect your personal information directly from you. We may collect this information in several ways, for example:

- when you attend our premises and communicate with us in person
- when you communicate with us by way of telephone or videoconferencing
- communicating with us in writing (e.g. email, text messages, forms)
- interacting with us online via our website and social media pages
- participating at events or forums (e.g. external training).

We may collect personal information from a third party or a publicly available source, but only if you have consented to such collection or would reasonably expect us to collect your personal information in this way. For example:

- referees provided by you in support of an application for a position (either as a volunteer, student placement, employee or contractor)
- another organisation/s (e.g. during recruitment to conduct background/screening checks)
- referrers who refer you to us for support or other sources to assist us in providing services to you
- other organisations that you have donated to, where you have consented to receiving information from like-minded organisations
- your representative/s (e.g. lawyer, family member, guardian, power of attorney).

If you supply us with information about another person, you should ensure you are authorised to do so. You must inform that person who we are, that we will use and disclose their personal information as outlined in this Policy, and that they have certain rights to access the personal information that we hold about them. However, if you reasonably believe that the disclosure of personal information is necessary to prevent or reduce a serious and imminent threat to someone's life, health or safety, then you are permitted to disclose the personal information without the consent of the individual concerned. Further, if it is reasonably impracticable to obtain the individual's consent in such situations, consent may be disregarded.

If you have referred us to a third party to collect personal and sensitive information they hold about you, we will assume, and you must ensure, that the third party is aware that you have referred us to them and of the purposes involved in the collection, use and disclosure of your personal information.

### What types of information do we collect?

The personal information we collect will depend on who you are and the nature of your interaction with us. For example, if you:

- engage or interact with our services, depending on how you interact with us (e.g. phone, chat, text, face-to-face), we may collect your name, contact details, details of your authorised representative (if applicable), government identifiers (e.g. Medicare card, Centrelink Reference Number), financial details (if necessary to assist in identifying or accessing government assistance or where claiming financial hardship), information about your circumstances, any special needs (e.g. language or communication needs/preferences) as well as what you are seeking support with
- provide support to persons accessing our services, we may collect your name, organisation, background and screening checks, insurance details and contact details
- subscribe to a mailing list, we may collect your name and email address
- make a donation, we may collect your name, contact details, the amount and frequency of your donation
- attend an event (e.g. training, seminar), we may collect your name, organisation, contact details, payment details (if applicable) and any dietary and accessibility requirements or special needs
- visit our premises (e.g. attend a meeting, maintenance and building works), we may collect your name, organisation/business, contact details and reason for visit
- participate in our surveys, we may collect your name, organisation, contact details and your survey responses
- contact us via our Accounts/Administration phoneline, we may collect your name, organisation/business, contact details and purpose of your call
- send us an enquiry via our website, we may collect your name, contact details, information about your circumstances and details of your query
- send us an enquiry or respond to a post on our social media pages, we may collect your name or profile name, information about your circumstances and details of your query
- make a complaint, we may collect your name, contact details, the details of your complaint, information collected in any investigation of the matter and details of the resolution of the complaint
- apply for employment or to become a volunteer, we may collect the information you include in your application, including your cover letter, resume, contact details and referee reports as well as background and screening checks and government identifiers (e.g. driver licence or passport numbers)

- attend our premises, we use closed circuit television (CCTV) recordings to maintain the safety and security of visitors, staff and property, however these systems may not always collect and store personal information.

The choice of how much information you provide is yours and depends on the purpose(s) for which you interact with us.

We also collect information that is non-personal because it does not identify you or any other persons (e.g. collection of anonymous answers to surveys or aggregated data about how users use our website).

### How do we deal with unsolicited personal information?

If we receive personal information about you that we have not requested, we will make an assessment as to whether we could have collected the personal information from you ourselves. If we could not, we will destroy or de-identify it as soon as it is lawfully and reasonably possible to do so. This can be affected by the options available to us, and the resources and costs of taking such action.

### Can you interact with us anonymously?

In some circumstances you can choose to interact with us anonymously or use a pseudonym (e.g. when viewing our website or making general telephone queries). However, if you do not provide us with your personal information, we may not be able to effectively deliver the requested services, progress a complaint or issue a tax-deductible receipt for donations.

### Do we collect sensitive information?

At times we may collect sensitive information about you if you contact one of our support services. This will only be in situations where the sensitive information is required for the function or activity we are carrying out, and is usually to enable us to promote your safety or the safety of others.

The choice of how much sensitive information you provide is yours. We will usually collect sensitive information directly from you. If you share sensitive information, it will be protected and handled in accordance with applicable laws.

## Use of your personal information

We use your personal information to perform activities necessary to carry out our functions and objectives.

We must only use your personal information for the primary purpose for which it was collected, or for a secondary purpose which you have consented, or for a purpose related to (or if sensitive information directly related to) the primary purpose and you would reasonably expect the personal information to be used for such purpose.

Primary purposes (and secondary purposes for which consent is required and is sought) may include:

<b>Counselling and support services</b>	Providing trauma informed services to Australians that interact with our various services, including counselling and case management support.
<b>Service quality</b>	Recording interactions between staff and you for the purpose of service quality, training and improvement of our services.
<b>Training</b>	Delivering education and training programs to you and other organisations, and for related quality and continuous improvement purposes. Training of our clinical staff (clinical staff are our staff who interact with people seeking assistance).
<b>Information requests</b>	Supporting our requirements in relation to investigating and facilitating the complaints process, in addition to assisting information requests from third parties, such as the police or the coroner, to undertake investigations.

<b>Marketing and fundraising</b>	Communicating with individuals about donations, products, services, campaigns, causes and events to support the implementation of our functions and objectives.
<b>Research and evaluation</b>	Conducting and/or funding (internal and external) research, evaluation and assurance activities into our programs and services or research into supporter attitudes and understanding how to improve our counselling and support services.
<b>Community assistance and other support</b>	Enabling you to assist with volunteering, community fundraising, advocacy or other activities where community assistance is sought.
<b>Human resources</b>	Assessing suitable candidates for career opportunities with us and managing employees. Assessing suitable students or volunteers for student placement and volunteering opportunities with us.
<b>Other issues</b>	Communicating with you in relation to our operations, activities and objectives, to verify your identity, to improve and evaluate programs and services, and to comply with relevant laws. Communicating with the public and media, through our website and social media, to raise public awareness of our services

## Consent to collect and use your personal information

By engaging our counselling and support services, visiting our website or providing us your personal information, you agree to your information being collected, stored, used and disclosed as set out in this Policy.

### Call recordings and monitoring

We may record and monitor calls received to our counselling and support services and Administration/Accounts line for the primary purposes described above. We may use the call recording and monitor calls for the primary purposes, but only where you have been clearly informed that the call will be recorded and monitored, and you have consented to the call recording and monitoring.

Consent for call recordings and monitoring will be obtained:

<b>At the beginning of the call</b>	You will be notified using an Interactive Voice Response (IVR) which references this Policy prior to being connected to staff/clinical staff. You are taken to consent to the call recording and monitoring for our primary purpose unless once connected, you ask the staff member/clinical staff to stop recording at the beginning of the call.
<b>During the call</b>	If you wish to terminate the call recording during your call, you may request the staff/clinical staff to terminate the recording. Any portion of the call recorded until the point of termination will be maintained by us in accordance with this Policy.

We may also take notes of call to our counselling and support services, such as presenting issue/concern, support provided.

Staff conducting a call that is recorded or being monitored must be provided with written notice that the calls they answer will be recorded and of the primary purpose of the call recording.

## Marketing and fundraising

When you become a customer of ours (e.g. upon donation or attendance at our events), we may use your personal information for direct marketing or fundraising purposes. This means, from time to time, we may contact you with marketing or fundraising materials either by mail, SMS, telephone, targeted online advertising or online behavioural marketing. Of course, you can request not to receive marketing and/or fundraising communications at any time, and we will stop contacting you in this way.

## Disclosure of your personal information

We do not disclose personal information to another person or organisation (including police, emergency services or other government departments) unless one of the following applies:

- you have consented (whether expressly or implied) to the disclosure of your personal information
- you would reasonably expect, or have been told, that information of that kind is usually passed to those individuals or bodies and the disclosure:
  - in the case of personal information, relates to the primary purpose for which it was collected
  - in the case of sensitive information, is directly related to the primary purpose for which it was collected or
  - relates to the collection of personal information from a third party (e.g. fundraising websites)
- the disclosure is required or authorised by law
- we reasonably believe that the disclosure will prevent or lessen a serious and imminent threat to somebody's life, health, or safety (including your own) or serious threat to public health, property or public safety
- you have made threats to harm third parties or made threats to our staff
- the disclosure is to one of our service providers and advisors (refer below).

## Funding bodies

We disclose information to funding bodies in accordance with our service agreements. Where practical, this information is de-identified.

## Service providers and contractors

Personal information may be disclosed to our various service providers, contractors and advisers, such as our insurers and solicitors, those who host our website servers or manage our information technology (IT). For example, if we experience a technical fault in our IT systems (such as issues in receiving or sending emails), then our IT service provider may access our systems to assist in rectifying that fault and in doing so they may have access to your personal information that is stored on our systems.

To protect personal information that service providers and contractors may access or collect, the terms of our contracts require that they must only use or disclose personal information for the purposes of the contract.

## Will we disclose personal information overseas?

If you are accessing our counselling and support services, your personal information is not disclosed nor held overseas.

While we do not directly disclose any personal information overseas, it may be held at locations outside of Australia in the following circumstances:

- in connection with the processing of web traffic information disclosed to Google Analytics when you visit our website (Google stores information across multiple countries)
- when you communicate through social media channels, the social network provider and its partners may collect and hold your personal information overseas
- when you subscribe to our newsletter or when you donate through our website using the 'Donate' button, the service provider we use may store your personal information in secure cloud storage on servers located overseas
- where the disclosure is necessary to protect our legitimate interests.

We will endeavour to obtain your consent prior to disclosing your personal information to an overseas recipient in any circumstances not outlined above, where those circumstances are not common in our industry and such

consent is required by law. If you no longer consent to your information being disclosed overseas, please contact our Privacy Officer (refer to the [Contact Us](#) section below).

### Quality of your personal information

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To ensure the personal information we collect is accurate, up-to-date, and complete, we apply the following data quality procedures:

- information is recorded in a consistent format
- where necessary, confirm the accuracy of information collected from a third party or a public source
- promptly add updated or new personal information to existing records
- review the quality of personal information before use or disclosure.

### Storage and security of your personal information

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#### How do we store and secure your personal information?

Your personal information may be stored at the locations where we operate in various forms (including paper and electronic records), in secure cloud storage facilities and on servers operated or controlled by us or our service providers.

Security is a high priority for us. We take reasonable steps to protect the personal information we hold against loss, unauthorised access, inappropriate use, modification or disclosure, and against other misuse. Our security measures include, but are not limited to:

- implementing strong policies and procedures
- implementing electronic security procedures (e.g. anti-virus software, multi-factor authentication, firewalls, intrusion detection systems, using secure networks, encryption, only allowing staff with 'need to know' access to systems and records, password protection)
- undertaking background checks on staff
- imposing obligations of confidentiality on our staff who may have access to your personal information
- securing paper records in locked cabinets and where public access is restricted.

#### How long do we keep your personal information?

We generally hold personal information until it is no longer needed for the purpose for which it was provided. If you would like us to destroy or deidentify any personal information provided to us, please let us know and we will endeavour to do so to the extent that it is not impractical, and we no longer require the information for purposes permitted by law.

We generally retain personal information for a period of 7 years from the last contact with a person or otherwise in accordance with applicable laws. When we are no longer required to hold personal information, or we consider the personal information is no longer required for a particular purpose, we will ensure the personal information is effectively and securely destroyed or deleted.

In relation to minors using our services, we will store their personal information in accordance with applicable laws and service agreements. Where it is unknown whether a minor has contacted the service, we will retain the record for the relevant statutory period.

If we destroy or delete your personal information, we may not be able to contact you in the future in relation to our activities and you may have to provide certain information again before we can interact with you.

### Accessing and correcting your personal information

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We always aim to keep the most accurate, complete, up-to-date and relevant personal information. We request that you notify us of any personal information that may be inaccurate, outdated or incomplete.

You can request access to personal information we hold about you and to ask for corrections to that personal information.

We will need to verify your identity before we can provide access to your information or make any corrections to it, and we may ask for evidence supporting your request for corrections. We will endeavour to respond to any requests within 30 days.

You will be given access to your personal information and reasonable steps will be taken to correct it if we consider it is incorrect unless there is an exception or another law that allows or requires that it be denied. For example, access to your personal information may be denied if it is reasonably believed that:

- giving access would have an unreasonable impact on the privacy of other individuals
- giving access would pose a serious threat to the life, health or safety of any individual or to public health or public safety
- the request for access is frivolous or vexatious.

If we refuse to provide access to or to correct your information, you will be notified in writing of the reasons.

Generally, this process is free. However, in the event we do charge a fee, that is permitted by law, then you will be advised of the approximate fee in advance (note this applies to access only, there is no charge for requesting a correction to your personal information). Requests for access and/or correction should be directed our Privacy Officer (refer to the [Contact Us](#) section below).

## Our website

When you visit our website, we do not try to identify you or collect personal information. However, you might choose to provide your personal information when you complete an online form or make an enquiry via the 'contact us' page. Our website takes every precaution to protect personal information collected, and measures are in place to protect the loss, misuse and alteration of this information (refer to the [Security section](#) of this Policy).

To help us keep our website working optimally, our website may collect statistics about visits, such as how many people visit our website, the user's IP address, which pages people visit, the domains our visitors come from and which browsers they use. This information will not be used to identify you.

## Cookies

Our website generally collects 'cookies' when used. Cookies are small data files transferred by websites onto computers or devices for record-keeping purposes and to enhance website functionality. Cookies do not identify you personally, however, may contain information in relation to how you access and interact with our website.

Most browsers allow you to choose whether to accept cookies or not. If you do not wish to have cookies placed on your computer, set your browser preferences to reject all cookies before accessing our website. The core functionality on these platforms will be largely unaffected if you disable cookies in your browser but you may be unable to access some advanced functions.

## Analytics

We may use analytics tools to collect data about your interaction with our website and those analytics tools may be hosted by a third party.

Any data collected this way will be used to improve your experience when using our website. As an example, the type of data collected with these analytics tools may include:

- your device's IP address (collected and stored in an anonymised format)
- device screen size
- device type (including operating system and browser information)
- the country in which you accessed the website
- referring domain
- search terms and pages visited
- date and time when website pages were accessed.

We will not make decisions in relation to you based solely on automated processing (e.g. profiling) where doing so would have legal implications for you. Each decision we make will have a level of human involvement based on the available information.

## Third party links

Our website may contain links to other third-party websites. These websites are not subject to this Policy, and we are not responsible for the content of those websites or the privacy practices of these websites.

## Social media

We use social media services, such as Facebook, to communicate with the public and raise awareness about our services. When you communicate with us using these services your personal information may be collected,

however it will only be used to assist us to communicate with you and the public. The social network provider may also handle your personal information for its own purposes. These services have their own privacy policies which you can access directly on their websites.

We do not provide counselling and support services via our social media services. Refer to our Social Media Terms of Use for further information.

### Notifiable Data Breach Scheme

Under the Notifiable Data Breaches scheme, we must notify affected individuals and the Office of the Australian Information Commissioner (OAIC) when a data breach is likely to result in serious harm to an individual whose personal information is involved.

A data breach occurs if personal information we hold is lost or subjected to unauthorised access or disclosure. For example, when:

- a device with a customer’s personal information is lost or stolen
- a database with personal information is hacked
- personal information is mistakenly given to the wrong person.

In any notification that we provide to individuals, we will include recommendations about the steps they should take in response to the data breach. We will also notify the OAIC using the provided channels, as a matter of priority.

Depending on the nature of the data breach, area of DVConnect and/or individual/s impacted/affected, we may also be required to report the breach to our funding bodies, as required our service agreements.

### Complaints

We take privacy complaints seriously. If we receive a complaint, we will determine what (if any) action should be taken to resolve the complaint. You will be notified of any decision relating to your complaint as soon as is practicable after it has been made.

If you are not satisfied with our response to your complaint or have not received a response within 30 business days, you may contact:

- [Office of the Australian Information Commissioner](#)
- [Office of the Information Commissioner Queensland](#).

### Contact us

If you have any questions or concerns, need support to understand our Privacy Policy, would like to access or correct your personal information, or wish to make a complaint, please contact us using the details set out below:

Phone: 07 3156 2323

Email: [mail@dvconnect.org](mailto:mail@dvconnect.org)

Address: PO Box 10575, Adelaide Street, Brisbane 4000

If you are contacting us via telephone, please ask to speak to our Privacy Officer. Any email or postal correspondence should be marked “private and confidential” and addressed to the Privacy Officer.

### Updates

We will update this Policy from time to time to reflect our information handling practices, services or changes to the law. Updates will be published to our website and are effective from the date of publication.

### Document history

Version	Approval date	Effective date	Document owner	Approved by	Summary of change/s	Next review
1.0	April 2025	May 2025	Policy and Compliance team	Board	☑New – replaces the privacy summary on the DVConnect and VictimConnect websites.	April 2028