

# Privacy Policy

## Umbrella Dementia Cafés Ltd

### Purpose

Your privacy is of paramount importance to Umbrella Dementia Cafés Ltd ('UDC' / 'we' / 'us'). We are committed to providing quality services to all UDC clients and stakeholders, whilst maintaining our obligations in respect of the responsible handling, use and storage of all Personal Information collected.

We have adopted the Australian Privacy Principles (**APPs**) contained in the Privacy Act 1988 (Cth) (**Privacy Act**) and are committed to acting in accordance with our obligations under applicable privacy legislation. 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 Commissions at [oaic.gov.au](http://oaic.gov.au).

This policy explains how and why we collect, use, hold and disclose your personal information, including how we take reasonable steps to keep personal information secure. You consent to us collecting, holding, using and disclosing your personal information in accordance with this policy and the APPs.

In addition to the information handling practices outlined in this privacy policy, UDC ensures transparency about the way it handles personal information and the reasons why it is collected. We want to ensure that all information is collected with your consent.

The primary purpose for collecting personal information as defined in this policy and under the APPs (**Personal Information**) from you is in order for us to provide a complete service and/or product experience and to ensure that we are able to maintain a productive relationship with you.

Please note that employee records held by UDC are exempt from the APPs and are not covered by this Policy.

### 1. What is Personal Information?

Personal Information is any information or an opinion about an identified individual, or an individual who can be reasonably identified, from the information or opinion.

Examples of Personal Information include names, addresses, email addresses and phone numbers.

Information or an opinion may be Personal Information regardless of whether it is true.

## **2. What Personal Information do we collect and hold?**

The type of Personal Information collected will depend on the nature of our engagement with you. Generally, we collect Personal Information about you and your interactions with us. The kinds of Personal Information we may collect from you includes the following:

- Solicited and unsolicited personal details, such as name, age, gender and date of birth.
- Your business contact information;
- Contact details, such as email address, postal address, and phone number.
- Payment information for donations, such as credit card details.
- Details of enquiries or complaints you make.
- Your photographic image where you have attended a UDC event and you have been photographed.
- Information to assist with demographic analysis where this information will assist us to develop future programmes, including where you live, enquiry purpose, what you're interested in and how did you hear about UDC
- Information relating to any planned fundraising event, tributes, in memorial, donations or bequests, including bank account, executors of your will, next of kin.

We may collect information about how you access, use and interact with our website. We do this by using a range of tools such as Google Analytics. This information may include:

(a) the location from which you have come to the site and the pages you have visited, length of visit, and viewed pages; and

(b) technical data, which may include IP address, the types of devices you are using to access the website, device attributes, browser type, language and operating system.

While this data is mostly anonymous, sometimes we will connect it to you, for instance in personalising a webpage, or prefilling a form with your details.

We use cookies on our website. A cookie is a small text file that the website may place on your device to store information. We may use persistent cookies (which remain on your computer even after you close your browser) to store information that may speed up your use of our website for any of your future visits to the website. We may also use session cookies (which no longer remain after you end your browsing session) to help

manage the display and presentation of information on the website. You may refuse to use cookies by selecting the appropriate settings on your browser. However, please note that if you do this, you may not be able to use the full functionality of the website.

### **3. How do we collect your information?**

The personal information that UDC collects depends on the service, product, activity, or program you are participating in. The sections below outline how UDC may collect information, the type of information we collect and how we use that information depending on the way you interact with UDC.

The type of Personal Information collected may be collected from various sources including:

- from you directly;
- from your use of our products, including online site and computer; and
- from outside sources or third parties.

This may include when you:

- make a donation;
- email us, call us or visit us (in person or online);
- visit our website and through our associated computer systems and platforms;
- use your internet/website;
- volunteer with us, apply for a position with us, fundraise for us, or are in receipt of our assistance;
- fill out a form provided to you i.e. visitor check in;
- contact us via social media;
- sign up to receive our newsletter;
- sign up to attend and online event or workshop;
- complete an online form or survey; or
- Through participation in fundraising programs including via online platforms, online, mail or in-person merchandise sales, tele-fundraising, and paper/online forms completed by you at special events held by UDC.

We will collect your personal information directly from you whenever you interact with us, unless it is unreasonable or impracticable to do so.

Where it is unreasonable or impracticable to collect information from you, we may collect information from third parties such as:

- (a) charity partners;
- (b) community organisations;
- (c) organisations that conduct background checks.

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

Where we are provided with information by third parties, we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

When we collect Personal Information, we will, where appropriate and where possible, inform you of how and why we are collecting the information and the intended purposes for which it has been collected.

## **4. Why do we collect, hold and use your personal information?**

We collect, hold and use your Personal Information for the primary purpose of carrying out our key function as Australia's only charity dedicated to dementia cafes; including:

- (a) enabling you to donate to UDC and be issued with appropriate tax receipts;
- (b) providing you, your organisation or relevant charity partner with dementia cafe directory services, and managing our relationship with you;
- (c) marketing, including informing you of an upcoming event, donation drive or relief call out;
- (d) enabling you to work or volunteer with us;
- (e) contacting you, for example, to respond to your queries or complaints, or if we need to tell you something important;
- (f) complying with our legal obligations and assist government and law enforcement agencies or regulators; or
- (g) identifying and telling you about things that we think may be of interest to you.

If you do not provide us with your Personal Information, we may not be able to provide you, or the organisation you represent, with our dementia cafes support products & services, communicate with you or respond to your enquiries.

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.

## **5. 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:

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

## **6. Anonymity**

Wherever it is lawful and practicable, persons have the option of not identifying themselves or using a pseudonym when entering into transactions with us.

## **7. How do we store and hold your personal information?**

We store most information about you in computer systems and databases operated by either us or our external service providers, who also operate in accordance with the APPs and Privacy Act. Some information about you is recorded in paper files that we store securely in accordance with our obligations under the Privacy Act.

We implement and maintain processes and security measures to protect Personal Information which we hold from misuse, interference or loss, and from unauthorised access, modification or disclosure.

These processes and systems include:

- (a) the use of identity and access management technologies to control access to systems on which information is processed and stored;
- (b) requiring all Team Members to comply with internal information security policies and keep information secure;
- (c) requiring all Team Members to complete training about information security; and
- (d) monitoring and regularly reviewing our practices against our own policies and against industry best practice.

We will also take reasonable steps to destroy or de-identify personal information once we no longer require it for the purposes for which it was collected or for any secondary purpose permitted under the APPs.

## **8. Who do we disclose your personal information to, and why?**

We will only use and disclose your Personal Information for the purposes for which you provide it.

We may disclose your Personal Information in a number of circumstances including but not limited to:

- our staff or staff of our associated entities, so that your enquiry, donation or account can be properly and adequately established, processed and handled;
- other UDC associated or third-party entities (local and national), where you have consented, so that we can carry out our key function as Australia's only dementia cafes support organisation, or for any of the purposes outlined in section 5 above; and
- external service providers so that they may perform services for us or on our behalf, for example, for the purposes of the third party conducting a background check on you.

We may also disclose your personal information to others where:

(a) we are required or authorised by law to do so;

(b) you may have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or

(c) we are otherwise permitted to disclose the information under the Privacy Act.

Should your Personal Information be disclosed by us, it will be done so only in accordance with and to the extent required by the law.

When your Personal Information is disclosed by us we will, where appropriate and reasonable, inform you of how and why the Personal Information has been disclosed, to whom it has been disclosed and the type of Personal Information disclosed.

By providing us with your Personal Information you are consenting to the disclosure of this Personal Information by us, for the primary purposes for which it was provided and obtained.

## **9. Security**

The security of your Personal Information is very important to us.

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 disclosed by us to an associated national entity, international entity or international third party for the primary purposes for which it was collected or a secondary purpose closely connected to the primary purpose.

If your Personal Information is disclosed to a national entity, an international entity or third party, we will, as required by law, ensure your privacy rights are adequately protected by organisational, technical, contractual and/or other lawful means.

We will take all reasonable steps necessary to protect your personally identifiable information as it is transmitted from your computer to our website and then once it is being used on one of our electronic platforms.

However, you should keep in mind that the transmission of information over the Internet is not completely secure or error-free, so please carefully consider the information you send online.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to safely destroy or permanently de-identify your Personal Information.

However, most of the Personal Information is or will be stored in files which will be kept by us for a minimum of seven (7) years, during which time the Personal Information will continue to be protected by the principles outlined in this Privacy Policy.

## **10. Do we use your personal information for marketing?**

Where we have obtained your consent to do so, or in circumstances where you would reasonably expect that your personal information would be used or disclosed for this purpose, we may use your Personal Information for fundraising and marketing purposes and contact you from time to time to let you know of UDC events, to register to donate, and let you know of the work UDC is doing that we believe may interest you. Any information collected and handled for fundraising and marketing purposes will be done so in accordance with the Privacy Act and the APPs.

Where you receive electronic marketing communications from us, you may opt out of receiving further marketing communications by following the opt-out instructions provided in the communication.

## **11. Access to and correction of your personal information**

You may access or request correction of the Personal Information that we hold about you by contacting us in writing. Our contact details are set out below at section 14. There are some circumstances in which we are not required to give you access to your Personal Information.

There is no charge for requesting access to your Personal Information, but we may require you to meet our reasonable administrative costs in providing you with access (such as photocopying costs or costs for time spent on collating large amounts of material).

We will respond to your requests to access or correct Personal Information in a reasonable timeframe and will take all reasonable steps to ensure that the Personal Information we hold about you remains accurate and up to date.

You may also request UDC to delete your Personal Information. UDC may not be able to delete you information if it is legally or contractually required to keep your Personal Information.

Please contact [enquiries@umbrelladementiacafes.com.au](mailto:enquiries@umbrelladementiacafes.com.au) to request access to, correction or deletion of your personal information. In order to protect your Personal Information, we may require identification from you before releasing any requested information.

## **12. Complaints**

If you have a complaint about the way in which we have handled your Personal Information, including your request for access or correction of your Personal Information, please contact us. Our contact details are set out below at section 14.

We will consider your complaint and determine whether it requires further investigation. We will notify you of the outcome of this investigation and any subsequent internal investigation.

If you remain unsatisfied with the way in which we have handled a privacy issue, you may approach an independent advisor or contact the Office of the Australian Information Commissioner (OAIC) ([www.oaic.gov.au](http://www.oaic.gov.au)) for guidance on alternative courses of action which may be available.

## **13. Contact details**

If you have any questions, comments, requests or concerns, please contact UDC at:

- [Enquiries@umbrelladementiacafes.com.au](mailto:Enquiries@umbrelladementiacafes.com.au)
- Po Box 1236, Blackburn North, Victoria 3130



- 0401 364 696

## **14. Changes to this policy**

From time to time, we may change our policy on how we handle Personal Information or the types of Personal Information which we hold. Any changes to our policy will be published on our website.

You may obtain a copy of our current policy from our website or by contacting us at the contact details above.