

# PRIVACY POLICY – For External Use

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## 1. Introduction

Your privacy is important to us.

This statement outlines Cultural Perspectives' policy on how it uses and manages personal information provided to or collected by it.

Cultural Perspectives is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act and is compliant with the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

Cultural Perspectives may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to Cultural Perspectives' operations and practices and to make sure it remains appropriate to the changing legal environment.

This privacy policy assumes that you are resident in Australia. If you are resident in the UK or Europe, please contact us for more information regarding how we treat your personal information.

## 2. Type of personal information Cultural Perspectives collects

The type of information Cultural Perspectives collects and holds includes (but is not limited to) personal information, including sensitive information, about:

- Behaviours, opinions, and attitudes provided during social research interviews, focus groups, surveys, or other data collection activities
- Addresses of contractors and, in some cases, research participants
- Bank details of contractors and, in some cases, research participants
- Email addresses
- Company details i.e. ABN/CAN
- Contact details of companies/contractors (phone number/mobile numbers)
- eDM subscriptions
- Social media account details (Facebook/LinkedIn)

### **Personal Information you provide:**

Cultural Perspectives will generally collect personal information held about an individual by way of phone calls, interviews, focus groups, forms, meetings etc. You do have the right to seek to deal with us anonymously or using a pseudonym, but in almost every circumstance it will not be practicable for us to deal with you or provide any services to you except for the most general responses to general enquiries, unless you identify yourself.

**Personal Information provided by other people:**

In some circumstances Cultural Perspectives may be provided with personal information about an individual from a third party, for example from a client.

**In relation to employee records:**

Under the Privacy Act the Australian Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to Cultural Perspectives' treatment of an employee record, where the treatment is directly related to a current or former employment relationship between Cultural Perspectives and employee. However, Cultural Perspectives must provide access to and ensure compliance with the Health Privacy Principles under the Health Records and Information Privacy Act 2002 No 71.

**How will Cultural Perspectives use the personal information you provide?**

Cultural Perspectives will use personal information it collects from you for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected, or to which you have consented.

In relation to direct marketing, Cultural Perspectives will use your personal information for direct marketing where you have provided that information, and you are likely to expect direct marketing: only then you will be sent direct marketing containing an opt out. If we use your personal information obtained from elsewhere we will still send you direct marketing information where you have consented and which will also contain an opt out. We will always obtain your consent to use sensitive information as the basis for any of our direct marketing.

We may use video surveillance for security purposes and the footage will be used only by Cultural Perspectives and by the providers of our security services for security purposes. Surveillance videos are not used by Cultural Perspectives for other purposes and the footage is not publicly available. Surveillance cameras are not located in any bathrooms or change room facilities.

**Job applicants, staff members and contractors:**

In relation to personal information of job applicants, staff members and contractors, Cultural Perspectives' primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.

The purposes for which Cultural Perspectives uses personal information of job applicants, staff members and contractors include:

- for insurance purposes
- for payroll purposes
- to satisfy Cultural Perspectives' legal obligations

Where Cultural Perspectives receives unsolicited job applications these will usually be dealt with in accordance with the unsolicited personal information requirements of the Privacy Act.

#### **Volunteers:**

Cultural Perspectives also obtains personal information about volunteers who assist Cultural Perspectives in its functions or conduct associated activities, such as to enable Cultural Perspectives and the volunteers to work together.

#### **Marketing and fundraising:**

Cultural Perspectives treats marketing and seeking donations for the future growth and development of the organisation as important. Personal information held by Cultural Perspectives may be disclosed to an organisation that assists in Cultural Perspectives' fundraising.

#### **Who might Cultural Perspectives disclose personal information to?**

Cultural Perspectives may disclose personal information, including sensitive information, held about an individual to:

- government departments
- people providing services to Cultural Perspectives
- lawyers, when legally required
- anyone you authorise Cultural Perspectives to disclose information to

#### **Sending information overseas:**

Cultural Perspectives will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases this consent will be implied); or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation

We do not use overseas providers of IT services including servers and cloud services.

### **3. How Cultural Perspectives treats sensitive information**

In referring to 'sensitive information', Cultural Perspectives means:

"information relating to a person's racial ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual orientation or criminal record, that is also personal information; and health information about an individual".

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

#### **Management and security of personal information**

Cultural Perspectives' staff are required to respect the confidentiality of personal information and the privacy of individuals.

Cultural Perspectives has in place steps to protect the personal information the organisation holds from misuse, loss, unauthorised access, modification, interference or disclosure by use of various methods including locked storage of paper records and passworded access rights to computerised records.

We have a data breach response plan, which we would follow in the unlikely event of a privacy or data breach.

When you use our website, having your cookies enabled will allow us to maintain the continuity of your browsing session and remember your details when you return. We may also use web beacons, Flash local stored objects and JavaScript. If you adjust your browser settings to block, reject or delete these functions, the webpage may not function in an optimal manner. We may also collect information about your IP address, although this may not identify you.

### **4. Access to your own personal information**

Cultural Perspectives endeavours to ensure that the personal information it holds is accurate, complete and up-to-date. A person may seek to update their personal information held by Cultural Perspectives by contacting the Privacy Officer of Cultural Perspectives at any time.

The Australian Privacy Principles and the Health Privacy Principles require Cultural Perspectives not to store personal information longer than necessary. In particular, the Health Privacy Principles impose certain obligations about the length of time health records must be stored.

You have the right to check what personal information Cultural Perspectives holds about you.

Under the Commonwealth Privacy Act and the Health Records Act, an individual has the right to obtain access to any personal information which Cultural Perspectives holds about them and to advise Cultural Perspectives of any perceived inaccuracy. There are some exceptions to this right set out in the applicable legislation. To make a request to access any information Cultural Perspectives holds about you, please contact the Privacy Officer in writing.

Cultural Perspectives may require you to verify your identity and specify what information you require. Although no fee will be charged for accessing your personal information or making a correction, Cultural Perspectives may charge a fee to retrieve and copy any material. If the information sought is extensive, Cultural Perspectives will advise the likely cost in advance.

### **How long will Cultural Perspectives keep my information?**

Under our destruction and de-identification policies, your personal information that is no longer required will be de-identified or destroyed. In many circumstances, however it will be kept for marketing purposes, as you will have consented to that in writing with us.

## **5. Enquiries and privacy complaints**

If you would like further information about the way Cultural Perspectives manages the personal information it holds, please contact the Privacy Officer.

Privacy Officer: Deanna Chapman, phone number: 02 8585 1307, email address: [privacy@culper.com.au](mailto:privacy@culper.com.au)

If you have any concerns, complaints or you think there has been a breach of privacy, then also please contact the Privacy Officer who will first deal with you usually over the phone. If we then have not dealt satisfactorily with your concerns we will meet with you to discuss further. If you are not satisfied with our response to your complaint within 30 days from this meeting then you can refer your complaint to the Office of the Australian Information Commissioner via:

- email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)
- tel: 1300 363 992
- fax: +61 2 9284 9666

## 6. Policy Review

This policy is to be reviewed by CPG Executive on a biennial basis.

## 7. Policy Approval

| Development Date | Approval Date | Review Date | Policy Owner        | Signed By |
|------------------|---------------|-------------|---------------------|-----------|
| 19.05.2023       |               |             | MD, Pino Migliorino |           |
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