



## Global Centre for Modern Ageing Privacy Policy

The Global Centre for Modern Ageing understands that your privacy is important and is committed to safeguarding personal information about individuals that we handle. This Privacy Policy describes generally how we manage this personal information and protect privacy, including how we comply with the *Privacy Act 1988* (Cth) (**Act**) and the Australian Privacy Principles contained in the Act.

### 1. Privacy Act

Global Centre for Modern Ageing Limited and its related bodies corporate (**we, us or our**) are organisations and “APP Entities” for the purposes of the Act and are bound by the Australian Privacy Principles.

This Privacy Policy is intended to provide a general overview of our policies in respect of the handling of your personal and sensitive information. “Personal information” is essentially information or an opinion about an identified or reasonably identifiable individual. “Sensitive information” includes information or an opinion about an individual's health and genetic information, racial or ethnic origin, political opinions, membership of a political or trade association or trade union, religious or philosophical beliefs or affiliations, sexual orientation or practices or criminal record.

Other policies may override this Privacy Policy in certain circumstances. For example, when we collect personal information from you, we may advise a specific purpose for collecting that personal information, in which case we will handle your personal information in accordance with that purpose.

This Policy is intended to cover most personal and sensitive information handled by us but is not exhaustive. If you have any queries about our handling of your personal or sensitive information, please contact us for further information.

### 2. Exemptions

No general exemptions under the Act apply to us, or to any of our acts or practices.

### 3. How we collect, hold and use personal information

#### 3.1 Collection

We will collect your personal information directly from you unless it is unreasonable or impracticable to do so. We will limit the personal information we collect to that which is reasonably necessary for our functions or activities.

The personal information about you that we may collect and hold includes but is not limited to your name and address, email address and contact telephone number. The sensitive information we may collect and hold about you includes, but is not limited to, information about your health, such as where you have applied to participate in market research activities. We may also hold other personal and sensitive information that you volunteer to us. You may remain anonymous or provide a pseudonym in certain circumstances, other than where we reasonably require you to identify yourself.

We may collect this information in circumstances that include where (as applicable):

- You contact us or submit an enquiry (such as through our website or by telephone);

- You participate in one of our service offerings, such as focus groups, in-depth interviews, case studies, processes of observation, market research, surveys or questionnaires;
- We provide services to our clients, such as conducting market research or performing advocacy, in which case we may collect the personal information of employees or contractors of our clients; or
- We deal with suppliers, service providers or other businesses and collect personal information incidentally to those dealings.

When collecting your personal information, we will take reasonable steps to make you aware of the purposes for which we are collecting it, the types of organisations to which we would usually disclose it, whether we are likely to disclose it to overseas recipients (and where practicable the countries in which they are located), whether there are laws or court/tribunal orders which require or authorise us to collect it, and the main consequences for you if you fail to provide it to us. This Privacy Policy provides these details as they typically apply in most cases, however different details may apply depending on our specific interaction with you. If we do not notify you of such other details, the information in this Privacy Policy applies.

If you fail to provide personal information requested by us, there may be a range of consequences, for example we may be unable to process or respond to your request. There will not usually be Australian laws or court/tribunal orders which require or authorise us to collect your personal information.

Where you provide us with personal information of another individual, we request that you inform them that their personal information will be disclosed to us and the purpose for doing so, and that they may contact us or review this Privacy Policy for further information.


### 3.2 Use

We will generally only use your personal information for the purpose for which we collected it, and for related purposes we consider would be within your reasonable expectations.

We generally use personal information for the following purposes (as applicable in the circumstances):

- To assess the suitability of prospective participants for particular research;
- To contact you in regard to participating in market research;
- To provide services or information that is requested, to respond to your enquiries, to send you information that you request, or otherwise achieve the purpose for which we have been contacted;
- To provide you with information that we consider is likely to be of interest to you relating to our products or services, including networking opportunities; or
- To perform advocacy on behalf of older people, including by seeking to influence government policies; or
- To engage in other activities where required or permitted by law.

We may use personal information to contact you for marketing and promotional purposes (such as to provide you with information about our services and network). You may request



not to receive these communications by contacting us (see section 11 below), or by using the opt out function provided for in those communications. If you do not opt out in either of these ways you will be taken to have consented to receiving such communications from us.

There are no consequences of opting out of receiving our marketing and promotional communications except that you will no longer receive them, and you may elect to rejoin our marketing list at a later stage if you wish.

Where we propose to use your personal information for a purpose other than as outlined above, we will seek your permission (unless we are required or permitted by law to do so without seeking consent).

### **3.3 Storage**

We will take reasonable steps to protect your personal information from misuse, interference and loss as well as unauthorised access, modification or disclosure.

For example, information stored on our computer network is protected by security features and procedures. We undertake regular monitoring of our practices and systems to review the effectiveness of our security policies and identify and implement improvements where appropriate.

We will endeavour to destroy or de-identify your personal information as soon as it is no longer required by us (where permitted by law).

## **4. Access to and correction of personal information**

You may contact us to request access to or correction of the personal information about you that we hold. We may refuse to allow access or to amend your personal information if we are legally required or entitled to do so. If we do so, we will provide you with written reasons for the refusal (unless it is unreasonable to do so) together with information about the options available to complain about the refusal.

We may require you to pay certain costs in order to access your personal information held by us. We will advise the amount payable (if any) once we have assessed your application for access. We will not, however, charge a fee for you to lodge a request for access to or correction of your personal information.

If you lodge a request for access to your personal information, we may fulfil that request in any of a range of ways (for example, by supplying you with a copy of that personal information or providing you with the opportunity to inspect our records). We may require you to comply with certain procedures before we allow access to or amendment of your personal information to help protect the integrity and security of information that we hold. Depending on the nature of your request, this may include completing a personal information request form or otherwise verifying your identity to our satisfaction.

We will take reasonable steps to ensure that the personal information that we collect is accurate, up-to-date and complete and the personal information we use and disclose is accurate, up-to-date, complete and relevant. If we are satisfied that any personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading, we will amend our records accordingly.

Please notify us if your personal details change so that we may keep our records current.

## 5. **Disclosure of personal information to other organisations and overseas**

We will generally only disclose your personal information for the purpose for which we collected it, and for related purposes we consider would be within your reasonable expectations.

We may disclose your personal information to the following third parties (as applicable in the circumstances):

- Certain contractors or subcontractors of ours (including consultants) that provide services to us (for example, mail processing businesses, printers, market research companies or other service providers). We generally seek to contractually oblige such organisations to ensure that information we disclose is used only for the limited purposes for which we provide it; and
- Members of our corporate group if appropriate in the circumstances.

We do not generally disclose personal information to third parties seeking to conduct telemarketing activities.

We are not generally likely to disclose personal information to overseas recipients, although in some cases we may work with overseas customers and in that case may disclose personal information to them. We will notify you of the likelihood of this on a case-by-case basis as required.

## 6. **Online privacy**

This section of our Privacy Policy sets out the manner in which we handle your personal information in respect of online services provided by us (which includes any services provided by us via the internet, such as our website, and also includes email communications between us).

Generally, we collect personal information about you only if you send us an email or register online as a prospective participant in our research activities.

### 6.1 **Automatic server logs**

Our servers automatically collect various details when you use our website, including:

- Your IP (Internet Protocol) address (generally, an identifier assigned to your computer when it is connected to the internet);
- The operating system and internet browser software you are currently using; and
- The data you access (such as web pages or other document files or software), and the time that you access it.

We do not attempt to identify individuals using this information, and only use it for statistical analysis, system administration and similar related purposes. This information is not disclosed to any other party.

### 6.2 **Cookies**

We use “cookies”, which identify your computer to our servers when you visit our website. Our website may store cookies on your computer in order to improve and customise your future visits to the website and allow you to securely access our website. By using cookies, our site can provide customised content to you. If you do not want information collected through the use of cookies, you may be able to configure your internet browser to disable cookies.

### 6.3 Email, messages and online registration

We may collect personal information from you (such as your name, contact details, date of birth, gender and email address, and any other personal information you volunteer) if you send us email or complete registration forms on our website. We will use this to contact you to respond to your message, to send you information that you request, and for other related purposes we consider are within your reasonable expectations. We will not use or disclose any such information for any other purpose without your consent (unless we are required or permitted by law to do so without seeking consent).

### 6.4 Storage and transmission of personal information online

If you provide any personal information to us via our online services (including email) or if we provide such information to you by such means, the privacy, security and integrity of this information cannot be guaranteed during its transmission unless we have indicated beforehand that a particular transaction or transmission of information will be protected (for example, by encryption).

If we receive your personal information, we will take reasonable steps to store it such that unauthorised access, modification, disclosure, misuse and loss are prevented.

### 6.5 Other online services

If any of our online services (including any email messages we send to you) contain links to other online services that are not maintained by us, or if other services link to our online services, we are not responsible for the privacy practices of the organisations that operate those other services, and by providing such links we do not endorse or approve the other services. This Privacy Policy does not apply in respect of third-party online services.

## 7. Data breach

If a data breach or suspected data breach occurs, we will undertake a prompt investigation, which will include an assessment of whether the incident is likely to result in serious harm to any individuals. In such a situation we will comply with the requirements of the Act, which may require notification to the Office of the Australian Information Commissioner (OAIC) and affected individuals. Please contact us if you have reason to believe or suspect that a data breach may have occurred, so that we can investigate and, if necessary, undertake appropriate containment, risk mitigation and notification activities as required.


## 8. Changes

We reserve the right to amend this Privacy Policy at any time. We publish our current Privacy Policy on our website, and you may obtain a copy of our Privacy Policy from that website or by contacting us.

## 9. Complaints

If you believe that a breach of your privacy has occurred, we encourage you to contact us to discuss your concerns. Our contact details can be found in section 10 below.

Your complaint will be considered and dealt with by our nominated representative, who may escalate the complaint internally within our organisation if the matter is serious or if necessary to resolve it.



Please allow us a reasonable time to respond to your complaint. If you are not satisfied with our resolution, you may make a complaint to the Office of the Australian Information Commissioner, whose contact details can be found at: [www.oaic.gov.au](http://www.oaic.gov.au).

10. **Further information**

You may contact us if you require further information about the ways we manage your personal and/or sensitive information.

11. **Contact information**

Global Centre for Modern Ageing

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