

Privacy Policy

1 Purpose

The purpose of this document is to provide a framework for NAWIC in dealing with privacy considerations.

2 Scope

This Policy applies to all NAWIC operations and activities. All Chapter Members and Board Members must ensure they read, understand and comply with this Policy.

3 Policy Statements

The Board of NAWIC is committed to protecting the privacy of personal information which the association collects, holds and administers. Personal information is information which directly or indirectly identifies a person.

3.1 General Requirements

NAWIC collects and administers a range of personal information for the purposes of running an Association. The Association is committed to protecting the privacy of personal information it collects, holds and administers.

NAWIC recognises the essential right of individuals to have their information administered in ways which they would reasonably expect – protected on one hand, and made accessible to them on the other. These privacy values are reflected in and supported by our core values and philosophies and also reflected in our Privacy Policy, which is compliant with the Privacy Act 1988 (Cth).

NAWIC is bound by laws which impose specific obligations when it comes to handling information. The organisation has adopted the following principles contained as minimum standards in relation to handling personal information.

NAWIC will:

- Collect only information which the organisation requires for its primary function;
- Ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered;
- Use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent;
- Store personal information securely, protecting it from unauthorised access; and
- Provide stakeholders with access to their own information, and the right to seek its correction.

3.2 Collection

NAWIC will:

- Only collect information that is necessary for the performance and primary function of NAWIC.
- Notify stakeholders about why we collect the information and how it is administered.
- Notify stakeholders that this information is accessible to them.
- Collect personal information from the person themselves wherever possible.
- If collecting personal information from a third party, be able to advise the person whom the information concerns, from whom their personal information has been collected.
- Collect Sensitive information only with the person's consent. (Sensitive information includes health information and information about religious beliefs, race, gender and others).
- Determine, where unsolicited information is received, whether the personal information could have collected it in the usual way, and then if it could have, it will be treated normally. (If it could not have been, it must be destroyed, and the person whose personal information has been destroyed will be notified about the receipt and destruction of their personal information).

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3.3 Use and Disclosure

NAWIC will:

- Only use or disclose information for the primary purpose for which it was collected or a directly related secondary purpose.
- For other uses, NAWIC will obtain consent from the affected person.
- In relation to a secondary purpose, use or disclose the personal information only where:
 - a secondary purpose is related to the primary purpose and the individual would reasonably have expected us to use it for purposes; or
 - the person has consented; or
 - certain other legal reasons exist, or disclosure is required to prevent serious and imminent threat to life, health or safety.
- In relation to personal information which has been collected from a person, use the personal information for direct marketing, where that person would reasonably expect it to be used for this purpose, and NAWIC has provided an opt out and the opt out has not been taken up.
- In relation to personal information which has been collected other than from the person themselves, only use the personal information for direct marketing if the person whose personal information has been collected has consented (and they have not taken up the opt-out).
- State in NAWIC's privacy policy whether the information is sent overseas and further will ensure that any overseas providers of services are as compliant with privacy as NAWIC is required to be.
- Where for a legal or other reason we are not required to provide a person with access to the information, consider whether a mutually agreed intermediary would allow sufficient access to meet the needs of both parties.
- Make no charge for making a request for personal information, correcting the information or associating a statement regarding accuracy with the personal information.

3.4 Storage

NAWIC will:

- Implement and maintain steps to ensure that personal information is protected from misuse and loss, unauthorised access, interference, unauthorised modification or disclosure.
- Before NAWIC discloses any personal information to an overseas recipient including a provider of IT services such as servers or cloud services, establish that they are privacy compliant. NAWIC will have systems which provide sufficient security.
- Ensure that NAWIC's data is up to date, accurate and complete.

3.5 Destruction and De-Identification

NAWIC will:

- Destroy personal information once is not required to be kept for the purpose for which it was collected, including from decommissioned laptops and mobile phones.
- Change information to a pseudonym or treat it anonymously if required by the person whose information NAWIC holds and will not use any government related identifiers unless they are reasonably necessary for it's functions.

3.6 Data Quality

NAWIC will take reasonable steps to ensure the information it collects is accurate, complete, up to date, and relevant to the functions it performs.

3.7 Data Security and Retention

NAWIC will only destroy records in accordance with the organisation's Records Management Policy.

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3.8 Openness

NAWIC will:

- Ensure stakeholders are aware of its Privacy Policy and its purposes.
- Make this information freely available in relevant publications and on the NAWIC's website.

3.9 Access and Correction

NAWIC will ensure individuals have a right to seek access to information held about them and to correct it if it is inaccurate, incomplete, misleading or not up to date.

3.10 Making Information Available to Other Organisations

NAWIC can release information to third parties where it is requested by the person concerned.

4 Responsibilities

NAWIC's Board is responsible for developing, adopting and reviewing this policy.

NAWIC Chapter Presidents are responsible for the implementation of this policy, for monitoring changes in Privacy legislation, and for advising on the need to review or revise this policy as and when the need arises.

5 Reporting

There are no reporting requirements for this Policy.

6 Further Information

All members and Chapters who require further information or need clarification of anything contained in this Policy should contact the National Chair.

7 Accountabilities

Compliance to Policy	All Members
Implementation & Review	NAWIC Board
Approval of Policy	NAWIC Board
Monitoring	NAWIC Board
Interpretation and Advice	NAWIC Board

8 Related Documents

Not applicable.

9 Definitions and Abbreviations

The following definitions and abbreviations are used throughout this Policy:

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Term	Definition
Privacy Act	<p>The Privacy Act 1988 (Privacy Act) regulates how personal information is handled. The Privacy Act defines personal information as:</p> <p><i>...information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable.</i></p> <p>Common examples are an individual's name, signature, address, telephone number, date of birth, medical records, bank account details and commentary or opinion about a person.</p>

10 Document Amendment History

Revision	Date	Description	Prepared By	Approved By
1.0	15/01/18	Draft	RSP	
2.0	27/09/19	Final for Board Approval	FMD	BOARD