DCA PRIVACY POLICY

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Scope

This policy applies to all Deaf Children Australia (DCA) employees, DCA Volunteers, DCA Board members and DCA contractors. All people working for DCA are required to be familiar and comply with the obligations set out in this Privacy Policy.

This policy also outlines how DCA manages personal information collected from participants, families, donors, supporters, employees and other individuals who interact with DCA.

Objectives

The objective of this policy is to ensure employees, volunteers, contractors and external stakeholders are aware of and understand how DCA protects the privacy of any personal information it collects, holds and manages.

Overview

Deaf Children Australia (ABN 108 025 207) is committed to protecting personal information and ensuring transparency in how it is collected, used, and disclosed. We use personal information to:

- Deliver and improve services,
- Manage communications,
- Comply with legal obligations, and
- Support fundraising activities.

Further information about the disclosure of personal information is provided in the Disclosure of Personal Information section. Information about the use and disclosure of personal information in connection with fundraising activities is outlined in the section Fundraising and Donor Privacy.

DCA complies with the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cth). Further information can be found at the Office of the Australian Information Commissioner (OAIC): https://www.oaic.gov.au.

What is personal information and why do we collect it?

When used in this Privacy Policy, the term “personal information” has the meaning given to it in the Privacy Act.

Personal information includes a broad range of information, or an opinion, that could identify an individual. What is personal information will vary, depending on whether a person can be identified or is reasonably identifiable in the circumstances.

For example, personal information may include, but is not limited to:

- an individual’s name, signature, address, phone number or date of birth
- sensitive information
- employee record information
- photographs
- internet protocol (IP) addresses
- location information from a mobile device (because it can reveal user activity patterns and habits).

The *Privacy Act 1988- external site* doesn’t cover the personal information of someone who has died.

We collect your Personal Information for the primary purpose of providing our services to you, providing information to our clients and marketing. 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. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

When we collect Personal Information, we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

What is sensitive information?

Sensitive information is personal information that includes information or an opinion about an individual:

- racial or ethnic origin
- political opinions or associations
- religious or philosophical beliefs
- trade union membership or associations
- sexual orientation or practices
- criminal record
- health or genetic information

Sensitive information will be used by us only:

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

Third Parties

DCA may receive personal information from referral partners, government agencies, funding bodies, and service providers. We take reasonable steps to ensure third parties comply with privacy laws, contractual obligations, and data security measures.

Disclosure of Personal Information

We may disclose personal information to:

- Third-party service providers assisting with program delivery.
- Government agencies to meet reporting requirements.
- Regulators or law enforcement when required by law.
- Fundraising and donor communications (with consent).

Personal information relating to participants, families and service users is not used or disclosed for fundraising purposes. Further details about donor information and fundraising activities are provided in the section, *Fundraising and Donor Privacy*.

DCA will only disclose personal information where it is reasonably necessary for the purposes for which the information was collected or where required or authorised by law.

Security of Personal Information

DCA ensures personal information is protected from unauthorised access, misuse, modification, or disclosure. Information is stored securely in:

- Physical format: Access-controlled offices.
- Electronic format: Secure, encrypted servers.

When no longer needed, personal information is securely destroyed or de-identified, except where legal retention periods apply.

How do we store and secure personal information?

Deaf Children Australia makes every effort to protect your personal information from unauthorised access, improper use, alteration and destruction.

We store personal information in order to ensure that we can manage and maintain communication with individuals and organisations we work with. Deaf Children Australia holds personal information in either:

a) Hard copy (paper based) format in secure access-controlled offices; or

b) Electronic format (databases and email files) which requires login and passwords and are stored on our secure servers.

Deaf Children Australia's Privacy Officer

The CEO appoints a Privacy Officer responsible for:

- Monitoring compliance with privacy policies.
- Ensuring staff awareness and training.
- Handling access requests and privacy-related complaints.

Access to your Personal Information

You may access or request corrections to your personal information by contacting us at privacy@deafchildren.org.au. Identification may be required before releasing information.

Unauthorised Access, Use or Disclosure of Personal Information

DCA takes any privacy breach seriously. In the event of a data breach, DCA will follow its Data Breach Response Plan, which includes steps to assess the impact, notify affected individuals where required, and report the incident to the OAIC under the Notifiable Data Breaches (NDB) scheme

Using the Internet

We collect non-identifiable statistical information to improve our services. This includes:

- Internet domain and IP address.
- Browser type and operating system.
- Pages viewed and documents downloaded.
- Referring website (if applicable).

DCA does not track individuals or identify users unless required by law.

Cookies and Tracking Technologies

DCA uses cookies to:

- Improve website functionality.
- Analyse visitor behaviour.
- Provide a better user experience.

You can disable cookies in your browser settings, but some website features may be affected.

Third Party Websites

DCA's website may contain links to external sites. We are not responsible for their privacy practices. We recommend reviewing their privacy policies before providing personal information.

Online Communication and Data Security

When you communicate with DCA online (e.g., via email or website forms), your information is stored in a secure environment. However, please be aware that, Internet transmission is not completely secure, and while DCA implements security measures, we cannot guarantee absolute protection.

If you have privacy concerns, we offer alternative ways to share information, such as mail or telephone

Fundraising and Donor Privacy

Deaf Children Australia uses your information to appropriately process and receipt your donations and to communicate with you about your support. To view our privacy policy visit www.deafchildrenaustralia.org.au/privacy.

To whom do we disclose your personal information

- We may disclose personal information for the following purposes:
- where you have consented to the disclosure and where you would reasonably expect us to disclose your personal information;
- when required by payment systems operators (e.g. merchants receiving card payments as set out above in the credit card information section);
- to our employees where the information is directly relevant to their role;
- to specific third parties authorised by you to receive information held by us;
- to third party service providers (including providers for the operation of our websites and/or our business or in connection with our fundraising and grant making activities);
- to our existing or potential agents, business partners (including our telemarketing, in-person and mailing house agents and contractors in order to enable them to perform services under contract with us which may directly or indirectly benefit the individual from whom the information was collected);
- to other entities, including government agencies and regulatory bodies for the purpose of our compliance with our statutory obligations;
- to satisfy our legal obligations including court order (such as subpoena), or other governmental order or process to disclose, or where we believe in good faith that the law compels us to so disclose the information.

Disclosure of personal information outside Australia

- We may disclose personal information outside of Australia in certain limited circumstances for example because certain IT functions are outsourced to an overseas provider or where information is stored on a cloud server located overseas. If we do so, we will take all steps that are reasonable in the circumstances to ensure that the overseas recipient does not breach the APPs, unless:
- the overseas recipient is subject to laws similar to the APPs and you have a right to take action against the overseas recipient;
- we reasonably believe the disclosure is necessary or authorised by Australian Law; or
- the individual has provided express consent to the disclosure.

Third parties

We endeavour to collect your personal information directly from you, unless it is unreasonable or impracticable for us to do so. In some circumstances we may collect your personal information from other third parties, such as your employer, contracting organisations, or from a publicly available record.

Should you wish to change your communication preferences, simply contact us by email to fundraising@deafchildren.org.au or phone on 1300 219 160

Access/correct personal information or make a privacy complaint

If you wish to access or correct your personal information or lodge a privacy-related complaint, please contact our Privacy Officer at:

- Email: privacy@deafchildren.org.au
- Phone: 1300 219 160

Requests are typically responded to within 30 days. If you are not satisfied with how we handle your privacy complaint, you may escalate your concerns to the Office of the Australian Information Commissioner (OAIC) at www.oaic.gov.au or by calling 1300 363 992.

Changes to the Deaf Children Australia Privacy Policy

This Privacy Policy is effective from 11/03/2026 We may change this Privacy Policy from time to time. Any updated versions of this Privacy Policy will be posted on our website.

References

- Commonwealth Privacy Act (1988)
- Australian Privacy Principles (APPs)
- Office of the Australian Information Commissioner (OAIC) - What is Personal Information?
- Australian Charities and Not-for-profits Commission (ACNC) - Fundraising Guidelines

Related documents

Current DCA Policies and Procedures that are located on SharePoint with particular focus on:

- Quality Policy
- Privacy Policy (easy read)
- Child Safe Policy
- Participant Service Delivery and Safeguarding Policy
- Risk Management Policy
- Cyber Security Policy
- Clear Desk and Clear Screen Policy
- Cyber Incident Response Plan
- DCA Employee Handbook