

# Privacy Policy

## Purpose and Scope

CRANAplus (referred to as “we”, “our”, “us”) is committed to respecting your right to privacy and protecting and safeguarding personal information belonging to CRANAplus customers, employees, members, clients, contractors, suppliers, and volunteers (referred to in this document as our ‘stakeholders’).

This policy provides information on how we collect, use, and manage your personal information. It should be read in conjunction with the CRANAplus Mental Health & Wellbeing Privacy Policy for stakeholders engaging in Bush Support Line services.

This policy applies to all CRANAplus services and operations and underpins all privacy notices that are published online and that we provide to you. It is reviewed regularly to ensure it continues to protect the privacy of CRANAplus stakeholders.

By choosing to share your personal data with us and using the services offered by CRANAplus, you’re acknowledging you have understood and agreed to the terms of this Privacy Policy.

## Our Commitment to Privacy

CRANAplus is committed to protecting the privacy of the personal information you provide to us.

We are sensitive to privacy issues and fully committed to complying with our obligations under the Privacy Act 1988 (Cth) (the “Privacy Act”), the Australian Privacy Principles (APPs) and any other applicable State/Territory privacy laws.

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 Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au).

## Terms and Conditions

Engaging with services from CRANAplus is an acceptance of our terms and conditions. Where these apply, they are available on the CRANAplus website.

## What is Your Personal Information

In this policy, “personal information” has the meaning given to it in the Privacy Act. In general terms, it is any information that can be used to identify you personally. This may include your name, address, telephone number, email address, occupation, gender, payment information etc. If the information we collect identifies you personally or you are reasonably identifiable from it, the information will be considered personal information.

## What Personal Information We Collect and Hold

We only collect and hold personal information that is reasonably necessary for the proper performance of our business functions, services, and activities.

By providing your personal information to us (by any means) and by using our website, you consent to CRANAplus collecting, storing, using, maintaining, and disclosing your personal information for the purposes set out in this Privacy Policy.

The information we collect about you may vary, depending on the circumstances of collection, your purpose for engaging with CRANAplus, and our relationship with you. Depending on the circumstances, some types of personal information will be required, and others may be optional for you to choose to provide to us.

In most situations, the personal information that we collect from you is provided by you directly.

Personal information that may be collected by CRANAplus can include, but is not limited to:

- contact and identity detail such as: name, address, email, telephone number, year of birth, gender, birth country.
- education and qualifications.
- information such as dietary requirements, allergies, or relevant medical history (if you choose to disclose) if attending a CRANAplus course.
- attendance on CRANAplus courses.
- details that are reasonably provided or requested as part of an employment or volunteer application.
- personal information which will enable CRANAplus to process your application for course enrolment, membership, and/or CRANAplus awards, scholarships, or grants.
- transaction details about any purchases from us.
- other personal information as appropriate to other CRANAplus services or functions.

We may also collect information about the devices you use to access the CRANAplus website, such as IP address and time/date of access.

We collect any preferences you select (such as subscriptions and marketing), as well as other personal information you disclose to us.

There may be times when an individual is registered onto a CRANAplus education course or nominated for an Award or Scholarship by an employer or other organisation/individual. In this case, we rely on the provider of that information to have informed those individuals that you are sharing their personal information for this purpose and have obtained their consent).

### Sensitive information

If it is reasonably necessary in the circumstances, CRANAplus may also collect sensitive information (as defined in the Privacy Act), where you choose to provide it, such as nationality, ethnic background, cultural diversity, or relevant health information.

Any sensitive information collected by CRANAplus is received because you have provided it to us directly. For example, you have filled in an online form and elected to disclose relevant allergies, dietary requirements or medical conditions that may be relevant to you attending a course. We do not collect sensitive information without you knowing and directly providing it to us.

Your consent to the collection of sensitive information will be assumed when you provide your information to CRANAplus for use in accordance with this Privacy Policy.

### **Anonymity and Pseudonymity**

Dealing with us anonymously or via a pseudonym will limit how you can participate in CRANAplus activities (for example, CRANAplus services and courses, membership, or applying for employment or volunteer positions with us). If you choose not to provide certain personal information to us, we will be prevented from providing you with a service or satisfying your request or enquiry.

Examples where it may be possible for you to engage with CRANAplus anonymously or with a pseudonym can include:

- Calling the Bush Support Line
- Attending a Wellbeing Workshop
- Annual Membership Surveys
- Submitting online surveys

## How We Collect Personal Information

CRANAplus will only collect and record personal information by fair, lawful and unobtrusive means.

CRANAplus may collect information from a variety of sources. CRANAplus acknowledges that you may choose to provide some personal information on a voluntary basis (for example, current employment details, skills/areas of interest, languages spoken, etc.) to assist in administering and providing quality services and outcomes on your behalf.

Generally, most personal information held by CRANAplus is collected directly from individuals (or from time to time through their appointed representatives), for example, where you:

- become a CRANAplus member (via the CRANAplus website or over the phone).
- create a CRANAplus online profile account (via CRANAplus website or mobile site).
- submit an online enquiry form via our website or mobile site.
- contact CRANAplus via email, telephone or mail.
- apply for employment or as a volunteer.
- provide details to CRANAplus in an application form, survey, or feedback form.
- purchase, enrol in, or participate in any CRANAplus course, service or activity.

Like most other websites, we may automatically record details about any computer or device used to access our website such as the date and time of access, the IP address, domain name, and details of the information accessed.

Information may also be collected from third parties, such as statutory bodies/government agencies or public sources of information (such as Professional Registration status).

If we hold personal information about you that has been collected from different sources, we may combine this personal information into a single record.

## Payment Information

You may purchase products and services via CRANAplus through our website or over the phone.

When making payments over the phone relating to your CRANAplus account, you will be asked to confirm your identity, to the satisfaction of CRANAplus.

We utilise a third-party provider that complies with the Payment Card Industry (PCI) requirements to safeguard the security of any credit card details provided and payments processed. The payment information that is entered on the website is sent securely to our processor and processed directly by our processor.

CRANAplus does not collect or store details of your payment information (but will collect and store information about the transaction). Your payment information will be collected and used for the purposes of processing your transaction, refunds and investigation of incorrect payment or fraudulent activities.

## **How We Notify You**

At the time of collecting personal information provide you with notice of this Privacy Policy and any relevant Terms and Conditions. Information relevant to how to contact us is available at [crana.org.au](http://crana.org.au).

Where you contact us via phone to provide information for the purpose of purchasing a membership, enrolling in a course, etc., the information collected is the same as what you would be providing via the website. Information provided to us over the phone is treated as confidential, secure, and adheres to this Privacy Policy.

## **How We Use Your Personal Information**

### Use

Unless otherwise disclosed during the collection process, personal information that we collect from you is used only for the purposes consistent with the reasons it was provided, for a reasonably related purpose, or where otherwise permitted by law.

Examples of how we may use your personal information include:

- administer, manage, and improve our products and services to you.
- perform identity-related checks.
- to have you enrol, register and participate in CRANAplus services (e.g. education courses).
- process your payments or refunds.
- provide effective services to consumers.
- maintain membership lists and activities.
- manage contact and supplier lists.
- perform audits to ensure validity and accuracy of information and processes.
- manage incident and Duty of Care reporting.
- coordinate and manage volunteers.
- use photographs in CRANAplus publications (with consent).
- provide information to the Australian Taxation Office in accordance with our obligations to advise of salary and taxation payments.
- undertake references from previous employers, educational organisations or other agencies or persons as part of a pre-employment check.
- assist contractors, service providers and other organisations working with or for CRANAplus to manage and/or deliver services (e.g. credit card payment providers, IT consulting).
- keep you informed of news and information relating to CRANAplus activities and opportunities via various mediums.
- compile and provide statistical and demographic information for reporting purposes.

Unidentified personal information in aggregate or summary form may be utilised for the following purposes:

- analyse data, evaluate, and report.
- prevent and detect security threats, fraud, and other malicious activity.
- comply with our legal obligations, resolve disputes, and enforce our agreements.
- use information gathered to review and /or improve the overall quality of our services.
- help us manage and enhance our service standards.
- use non-identifiable summary information to identify and advocate for the rural and remote health workforce and for reporting purposes.

### **Sharing Your Personal Information**

CRANAplus only uses and discloses personal information about you for the purpose/s it was intended for (or reasonably expected secondary purposes), where we have your consent to do so, or as otherwise required or permitted by law.

We do not sell or trade your personal information with third parties for marketing purposes.

We may, however, disclose your personal information to:

- our trusted service providers or persons who perform functions on our behalf (for example, but not limited to mailing services, payment processing provider, IT services, data analysis, contractors delivering services, event service providers).
- law enforcement agencies or other government and regulatory bodies as required or authorised by law.
- anyone else to whom you authorise us to disclose it.

Our trusted providers are required to demonstrate they commit to and uphold the Australian Privacy Principles, inclusive of a Privacy Agreement.

We may also use de-identified and/or aggregated summary personal information to prepare submissions to Government or other regulatory or funding bodies, or to plan events and activities.

### **Opting Out of Marketing and Communication**

We want to communicate with you only if you want to hear from us. If you prefer not to receive email newsletters from us, you can update your preferences on your CRANAplus online dashboard or click on the unsubscribe link at the bottom of any of our communications. To unsubscribe from print editions of CRANAplus Magazine, please submit a client enquiry.

### **Our Sharing of Personal Information Overseas**

The storing of online personal information held by our trusted third-party providers are primarily held in Australian data centres.

Where a third-party provider stores personal information in an overseas data centre, any personal information held overseas is limited (for example, your name and email address).

Under Australian privacy laws, we must take reasonable steps in the circumstances before personal information is disclosed to an overseas recipient to ensure that the overseas recipient does not breach Australian privacy laws in relation to your information.

## **How We Protect Your Personal Information**

CRANAplus takes the protection and security of personal information seriously. All reasonable steps are taken to protect personal information against misuse, interference, loss, unauthorised access, modification, and disclosure. This includes suitable physical, electronic, and managerial procedures to safeguard and secure the information we collect from you.

Electronic data is retained and safeguarded by our IT security systems, and any physical records are retained and disposed of securely as required (e.g. via the use of secured document destruction services).

The protective steps we take include:

- Confidentiality requirements are placed on our employees and contractors, service partners, etc., via contracts and policies.
- Limiting access to your information only to employees who require it, based on their roles and responsibilities.
- Educating our employees and contractors in relation to obligations under the relevant legislation and ethical codes of conducts for health practitioners.
- Personal information is contained in either our Customer Relationship Management System (CRM), and/or electronic file on our secure network with appropriate access permissions.
- Any physical records containing personal information are held in secured premises, with access to those records only permitted by those authorised to do so.
- The website contains secure areas, indicated by a padlock symbol in the browser. CRANAplus uses SSL (Secure Sockets Layer) for transmitting private information by encrypting the data transferred over the Internet. This protocol is a standard used by many websites when you submit confidential information, such as credit card numbers and other personal data. We will never store your credit card details on our servers.

## **How Long We keep Your Personal Information**

CRANAplus takes reasonable steps to ensure personal information held by us is retained, secured, and where applicable, destroyed in accordance with legislative requirements.

We will retain your information only for as long as is reasonably necessary for the purposes set out in this policy and/or to fulfil our legal obligations. However, we may retain some of your information after you cease to use our services to meet our legal obligations, such as retaining the information for tax and accounting purposes.

When determining the relevant retention periods, we will consider various factors including, but not limited to:

- our contractual obligations and rights in relation to the information involved.
- legal obligation(s) under applicable law to retain data for a certain period.
- statute of limitations under applicable law(s).
- (potential) disputes.
- guidelines issued by relevant data protection authorities.
- employee record exemptions are managed in line with Fair Work Act (2009) legislation.

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

## Accessing, Correcting and Deleting Your Personal Information

Your trust is very important to us and CRANAplus takes reasonable steps to ensure the personal information we collect, use and disclose is accurate in all respects.

Under the Privacy Act, you have a right to seek access to the information we hold about you.

Some of the personal information we hold about you is information provided directly by you and is accessible by logging into your online CRANAplus profile through the CRANAplus Website and Dashboard. Situations include if you have enrolled in a CRANAplus education course, hold a CRANAplus membership, or have created an online profile with CRANAplus.

In circumstances where you do not have direct access to view or adjust the information we hold about you, you have the right to ask us to correct information about you that is inaccurate, incomplete or out of date or request for your personal information to be deleted:

- You can put your request in writing or email and send it to us using the contact details below. We will comply with any such request except where the Privacy Act allows us to refuse to do so (such as a legal or legitimate reason to not release the information).
- We will respond to your request for access within a reasonable time, and usually within 10 business days, and may request additional information to clarify such requests.
- To protect your personal information, we may require identification verification before taking the requested action.
- If you have engaged with us via the use of a pseudonym or anonymously, CRANAplus will not be able to verify your identity and therefore not be able to respond to requests.
- In circumstances where the record cannot be altered or removed, we will provide a reason for this in writing to you and place a note on file of your objection.

## Privacy Enquiries, Complaints or Concerns

CRANAplus welcomes feedback concerning our Privacy Policy and privacy practices. We are committed to providing a fair and responsive system for handling and resolving complaints.

If you have any questions or concerns about this Privacy Policy, or how your personal information has been handled by CRANAplus, you can contact our Privacy Officer using the contact details set out below.

Telephone: (07) 4047 6400

Email: [privacy@crana.org.au](mailto:privacy@crana.org.au)

Mail: *Office of the CEO, CRANAplus, PO Box 7410, Cairns QLD 4870*

In line with our Feedback, Complaints or Compliments Policy, CRANAplus will make initial contact with you within 10 days of receipt and respond to your enquiry within a reasonable period, but no later than 30 days. During this time, we may discuss the subject of your enquiry, complaint, or concern with you.

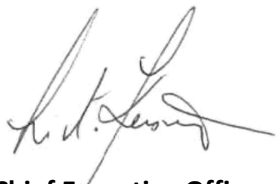
If you are not satisfied with the way in which we handle your enquiry or complaint, you can contact the Office of the Australian Information Commissioner (OAIC). You can contact OAIC by:

- Visiting [www.oaic.gov.au](http://www.oaic.gov.au);
- forwarding an email to [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)
- telephoning 1300 363 992; or
- writing to OAIC at GPO Box 5218, Sydney NSW 2001

### Changes to this Privacy Policy

This is our current Privacy Policy outlining the management of your personal information. To improve our service to you and ensure the highest level of compliance with the Australian Privacy Principles, we may revise this policy from time to time.

To ensure that you are viewing current information, please check that you are aware of the content of the current policy when visiting our website or engaging in services from CRANAplus.

A handwritten signature in black ink, appearing to read "L. Kensington", is enclosed within a rectangular box.

**Chief Executive Officer Linda**

Kensington

Authorised: 13 December 2023