

PRIVACY POLICY

current as of February 2017

BACKGROUND

Country Arts WA collects information about individuals and organisations via a number of channels including its website, by email, telephone and face-to-face contact. It stores this information both electronically and in paper form and uses this data, mostly in aggregated form for advocacy purposes as well as to communicate with the individual and organisation.

Given the annual turnover and nature of the activities undertaken by Country Arts WA, Privacy Act 1998, Section 6C requires the organisation to manage personal information it collects in an open and transparent way. The Australian Privacy Principles (APP) require the organisation to have a clearly expressed and up-to-date APP privacy policy describing how it manages personal information.

This privacy policy guide is based on the APPs in the *Privacy Act 1988* (Privacy Act) and the Office of the Australian Information Commissioner's (OAIC) *APP guidelines*. You should read this privacy policy guide together with the full text of the APPs and the APP guidelines.

POLICY STATEMENT

OUR PRIVACY COMMITMENT

Country Arts WA will endeavour to handle your personal information in accordance with our Privacy Policy and the Australian Privacy Principles.

This Privacy Policy summarises how we handle your personal information. We may revise this Privacy Policy from time to time by updating this document. The revised Privacy Policy will take effect when it is posted on our website.

WHAT IS PERSONAL INFORMATION?

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not.

The types of personal information we collect may include your name, gender, contact information and information regarding your arts related activities.

WHOSE PERSONAL INFORMATION DO WE COLLECT?

We collect personal information from people who are connected to our operations and activities – including employees, donors, research study participants, recipients of funding and support services, participants in advocacy campaigns, suppliers, volunteers and service providers.

HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

Where possible, we will collect your personal information directly from you. This may be in person (for example, where you attend an event), on the telephone (for example, if you contact the Country Arts WA staff, or if you answer a telephone-based research questionnaire), or online (for example, if you sign up for an event online or apply for funding online).

We also obtain personal information from third parties such as contractors (including fundraising service providers), list vendors and community workers. If we collect personal information about you from a third party and it is unclear that you have consented to the disclosure of your personal information to us, we will take reasonable steps to contact you and ensure that you are aware of the circumstances surrounding the collection and purposes for which we collected your personal information.

WHY DO WE COLLECT YOUR PERSONAL INFORMATION?

We may collect your personal information for a number of purposes, including:

- **Marketing:** to communicate with you about donations, products, services, campaigns, causes and events
- **Support services:** to provide you with information and support services, and to evaluate and report on these services
- **Research:** to conduct research studies relating to regional arts in Western Australia
- **Volunteering and other support:** to enable you to assist us with volunteering, community fundraising, advocacy and other activities where we seek the community's assistance
- **Other issues:** communicating with you in relation to our operations, activities and objectives, to verify your identity, to improve and evaluate our programs and services and to comply with relevant laws.

WHAT HAPPENS IF YOU DON'T PROVIDE ALL THIS INFORMATION?

If you do not provide some or all of the personal information requested, we may not be able to offer you services or provide you with information about our causes, activities, programs and projects.

USING A PSEUDONYM OR ENGAGING WITH US ANONYMOUSLY

Upon request, you will be given the opportunity to engage with us on an anonymous basis, or using a pseudonym.

WEBSITE USAGE INFORMATION AND COOKIES

When you access our website, we may use software embedded in our website (such as Javascript) and we may place small data files (or cookies) on your computer or other device to collect information about which pages you view and how you reach them, what you do when you visit a page, the length of time you remain on the page, and how we perform in providing content to you.

A cookie does not identify individuals personally, but it does identify computers. You can set your browser to notify you when you receive a cookie and this will provide you with an opportunity to either accept or reject it in each instance.

We may gather your IP address as part of our business activities and to assist with any operational difficulties or support issues with our services. This information does not identify you personally.

We use Google Analytics features based on Remarketing, Google Analytics Demographics, and Interest Reporting. These features use first-party and third-party cookies to inform and optimise content based on your past visits to our site.

We also use pixel tracking, which indicates when your computer has visited pages on our websites where a pixel has been installed. As with cookies, this does not identify you personally, only the device you are using.

Google Analytics informs us of how visitors use our site based on your browsing habits, so that we can improve our site to make it easier for you to find the information you are seeking. Google also receives this information as you browse our site and other websites on the Google Display Network using Remarketing.

If you would like to opt-out of customised Google Display Network services and Google Analytics for Display Advertising you can use Ad Settings. You can also use the Google Analytics Opt-out Browser Add-on so you are not tracked into Google Analytics.

OPTING OUT OF DIRECT MARKETING COMMUNICATIONS

Where we use your personal information to send you marketing and promotional information by post, email or telephone, we will provide you with an opportunity to opt-out of receiving such information. By electing not to opt-out, we will assume we have your implied consent to receive similar information and communications in the future. We will always ensure that our opt-out notices are clear, conspicuous and easy to take up.

If you do not wish to receive direct marketing communications from us please contact us at Country Arts WA, Level 1, 357 Murray St., Perth 6000, Ph: 08 9200 6200 and email: info@countryartswa.asn.au.

TO WHOM DOES COUNTRY ARTS WA DISCLOSE YOUR PERSONAL INFORMATION?

We may need to disclose personal information collected to others in order to carry out our activities. This may include:

- Researchers to conduct research studies relating to regional arts in Western Australia.
- Third parties for marketing purposes: we may provide your contact details to other like-minded organisations to contact you with information that may be of interest to you. From time to time, we participate in data collectives where we share your personal information (other than sensitive information) with other organisations.
- Contractors and service providers who perform services on our behalf, such as mailing houses, printers, information technology services providers (including offshore cloud computing service providers) and database contractors.
- Regional Arts Australia and its members.

Wherever we propose to disclose your personal information to a third party not outlined above, we will provide you with a collection notice which explains the circumstances in which we might disclose your personal information.

CROSS-BORDER DISCLOSURES OF YOUR PERSONAL INFORMATION

We use data hosting facilities and third party service providers to assist us with providing our goods and services. As a result, your personal information may be transferred to, and stored at, a destination outside Australia, including but not limited to New Zealand, Netherlands, China, Singapore, Hong Kong, Ireland, Canada, United States of America and the United Kingdom

Personal information may also be processed by staff or by other third parties operating outside Australia who work for us or for one of our suppliers, agents and partners. We take such steps as are necessary in the circumstances to ensure that any overseas third party service providers we engage do not breach the Australian Privacy Principles, including through contractual arrangements.

If your personal information is collected using a collection notice that references this Privacy Policy, you are taken to consent to the disclosure, transfer, storing or processing of their personal information outside of Australia. You also acknowledge and understand that by providing such consent that we will not be required to take such steps as are reasonable in the circumstances to ensure such third parties comply with the Australian Privacy Principles.

WHERE IS YOUR PERSONAL INFORMATION STORED

We take all reasonable steps to protect all of the personal information we hold from misuse, interference and loss, and from unauthorised access, modification or disclosure. Your personal information will be stored on a password protected electronic database, which may be on our database, a database maintained by a cloud hosting service provider or other third party database storage or server provider. Backups of electronic information are written to drives which are stored offsite.

Hard copy information is generally stored in our offices, which are secured to prevent entry by unauthorised people. Any personal information not actively being used is archived, usually for 7 years, with a third party provider of secure archiving services.

Where personal information is stored with a third party, we have arrangements which require those third parties to maintain the security of the information. We take reasonable steps to protect the privacy and security of that information, but we are not liable for any unauthorised access or use of that information. Your personal information will stay on the database indefinitely until you advise you would like it removed, unless we de-identify it or destroy it earlier in accordance with privacy law requirements.

ACCESS TO YOUR PERSONAL INFORMATION

We will, upon your request, and subject to applicable privacy laws, provide you with access to your personal information that is held by us. However, we request that you identify, as clearly as possible, the type(s) of information requested. We will deal with your request to provide access to your personal information within 30 days and you agree we may charge you our reasonable costs incurred in supplying you with access to this information.

Your rights to access personal information are not absolute and privacy laws dictate that we are not required to grant access in certain circumstances such as where:

- access would pose a serious threat to the life, safety or health of any individual or to public health or public safety
- access would have an unreasonable impact on the privacy of other individuals
- the request is frivolous or vexatious
- denying access is required or authorised by a law or a court or tribunal order
- access would be unlawful, or
- access may prejudice commercial negotiations, legal proceedings, enforcement activities or appropriate action being taken in respect of a suspected unlawful activity or serious misconduct.

If we refuse to grant you access to your personal information, we will provide you with reasons for that decision (unless it is unreasonable to do so) and the avenues available for you to complain about the refusal.

UPDATING YOUR PERSONAL INFORMATION

You may ask us to update, correct or delete the personal information we hold about you at any time. We will take reasonable steps to verify your identity before granting access or making any corrections to or deletion of your information. We also have obligations to take reasonable steps to correct personal information we hold when we are satisfied that it is inaccurate, out- of-date, incomplete, irrelevant or misleading for the purpose for which it is held.

If you require access to, or wish to update your personal information, please contact us at Country Arts WA, Level 1, 357 Murray St., Perth 6000, Ph: 08 9200 6200 and email: info@countryartswa.asn.au.

COMPLAINTS

If you have any queries or would like to make a complaint regarding relating to our Privacy Policy or the manner in which we handle your personal information, please contact Country Arts WA on 08 9200 6200 or email info@countryartswa.asn.au. We endeavour to respond to complaints and queries within fourteen days of their receipt. If you are dissatisfied with our response, you may refer the matter to the Australian Information (Privacy) Commissioner (see www.oaic.gov.au).

If you do not provide some or all of the personal information requested, we may not be able to offer you services or provide you with information about our causes, events, programs and projects.