

# RSL VICTORIA STATE BRANCH PRIVACY POLICY

RSL Policies reflect governance principles, governing documents, and the values of RSL Victoria. They are strategic documents.

STEX approved 19-12-2023 | Version 1.1 | Policy Number: GOV-POL-001

## PURPOSE

The Returned & Services League of Australia (Victorian Branch) Inc. (**RSL Victoria, we or us**) is committed to respecting the privacy of all personal information in its possession. In this Policy, a reference to “RSL Victoria” includes State Branch, all RSL Sub-Branches, Veteran and Families Wellbeing Centres and RSL Day Clubs.

RSL Victoria is bound by the *Privacy Act 1988* (Cth) (**Privacy Act**), including the Australian Privacy Principles (**APPs**). This Policy explains how we collect, use, hold and disclose your personal information in accordance with the Privacy Act.

## PERSONAL INFORMATION WE COLLECT

### What is personal information?

Personal information is any information or opinion about an identified individual or an individual who is reasonably identifiable from the information or opinion. Information or an opinion may be personal information regardless of whether it is true.

### What personal information do we collect and hold?

We collect personal information about members, volunteers, supporters, donors, beneficiaries, employees, members of the public, candidates for volunteer work and prospective employees.

The types of personal information we may collect depends on the purpose for which we need the information and may include the following:

- your contact details, including your full name, street address, billing address, postal address, email address, and telephone number;
- your date of birth and age;
- your occupation;
- information concerning your dealings with the Department of Veterans’ Affairs and your engagement with the Australian Defence Force, including your medical and service record;
- your payment information;
- your RSL membership number;
- your IP address, browser type, domain names, browsing preferences, access times and the addresses of referring websites;
- proof of identity information and documentation including drivers licence, passport or birth certificate information;

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- proof of income information and documentation;
- next of kin and emergency contact information;
- physical and mental health information, as described in the paragraph below;
- Centrelink Information (CRN & Pension Types);
- General Practitioner, Allied Health & Specialist contact information; and
- current and previous demographic information for specific programs.

## Collecting sensitive information

Sensitive information, a sub-set of personal information, is information or an opinion about an individual's racial or ethnic origin, political opinions, political association membership, religious beliefs or affiliations, philosophical beliefs, professional or trade association membership, trade union membership, sexual orientation or practices or criminal record, and includes health information and genetic information.

We may, with your consent, collect sensitive or financial information from you when providing you with our welfare support services. This sensitive information may include physical and mental health information, including your medical history and treating doctor.

RSL Victoria will only retain certain personal information such as copies your personnel and medical records for as long as they are needed in order to act on your behalf, following which we will delete or destroy any copies we hold as part of a periodic review of information that we hold.

## How do we collect information?

We collect personal information from you in the following ways, including when you:

- visit our website;
- apply for membership with us;
- register for events we organise and host;
- provide us with a donation or bequest;
- attend or apply to attend a Day Club;
- receive membership or other welfare services from us;
- contact Veteran Central;
- sign up to receive newsletters and information from us;
- register to become a volunteer with us;
- apply to become an employee of ours; and
- otherwise contact us or sign up to receive further information from us.

We may also collect personal information from third parties, such as:

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- Department of Veterans' Affairs on the members behalf.
- National Archives on the members behalf
- Treating medical professionals on the members behalf
- Other government departments, private and public organisations depending on the request for support from the member.

## HOW WE USE YOUR INFORMATION

We use the personal information we hold about you to do the following things:

- process your application for membership;
- provide membership services to you;
- operate Day Clubs;
- process your donations;
- provide wellbeing, financial assistance, compensation claims advocacy, and social and recreational connection services to you;
- respond to your enquiries;
- liaise with our regions and Sub-Branches with whom you are involved;
- facilitate recruitment and ongoing engagement of volunteers and staff;
- facilitate the operation of Day Club activities;
- provide further information about our organisation and services;
- to seek feedback on RSL Victoria initiatives; and
- to conduct surveys or questionnaires for the purpose of improving our services
- to understand growth and retention of our members

### Anonymity

We respect your right to privacy and recognise that there are some circumstances where you may prefer not to provide us with your personal information. Wherever lawful and practicable, we will provide you with the opportunity to not identify yourself, such as when making a donation or participating in surveys.

However, there are some circumstances where we need to collect and disclose identifiable information about you in order to provide you with services, such as when we are processing or supporting your claim for pensions or other benefits.

If you do not provide us with your personal information in these circumstances, we may not be able to provide you with our services, communicate with you or respond to your enquiries.

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## HOW WE HOLD AND STORE YOUR INFORMATION

We store most information about you in computer systems and databases operated by either us or our external service providers. Some information about you is recorded in paper files that we store securely.

We implement and maintain processes and security measures to protect personal information which we hold from misuse, interference or loss, and from unauthorised access, modification or disclosure.

These processes and systems include:

- requiring all volunteers and employees to comply with internal information security policies and keep information secure;
- restricting access to personal information to only those volunteers and employees who require such information in order to perform their duties and responsibilities within the organisation;
- prohibiting RSL Sub-Branches from displaying personal information in public areas without the relevant person's consent; and
- shredding documents which are no longer required or via a contracted confidential disposal company.

We may from time to time utilise overseas data hosting facilities or enter into contractual arrangements with third party service providers outside of Australia, which may involve storage or disclosure of your information with or to overseas recipients.

We will take reasonable steps to destroy or de-identify personal information once we no longer require it for the purposes for which it was collected or for any other secondary purpose permitted under the APPs.

## DISCLOSURE OF YOUR PERSONAL INFORMATION

We may need to disclose your personal information in order to provide you with services, respond to your queries etc. The following are examples of when we might disclose your personal information:

- to the Department of Veterans' Affairs, health services, or other human services agencies in order to perform our advocacy, welfare, and aged-care support functions;
- to other RSL state branches in order to facilitate ongoing communication with donors who reside outside of Victoria;
- with our volunteers, where necessary for them to provide assistance;
- to our service providers, including providers of ICT services, where necessary to provide us with services; and

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- to RSL sub-branches for direct member/ patron enquiries

## HOW WE DEAL WITH PRIVACY BREACHES

If we discover that we have breached your privacy, the breach will be referred to our Privacy Officer who will assess the breach and follow directives of the Privacy Commissioner in accordance with the Privacy and Data Protection Act (Vic) 2014.

We will endeavour to contact impacted parties and keep them informed on the progress of the breach response and corrective actions.

## YOUR RIGHTS

### Accessing and correcting your personal information

Under the Privacy Act, you have the right to ask for access to personal information that we hold about you and ask that we correct that personal information. You can ask for access or correction by contacting us and we will respond to your request within a reasonable period. We prefer that any correction or access requests are made by completing a Request to Access Confidential Information form, however you may contact us via any means, including via the contact details below.

There are some circumstances where we may refuse to give you access to personal information, for example where we believe that giving you access would have an unreasonable impact on the privacy of others. Where we refuse access, we will provide you written reasons for the refusal. If you disagree with our decision, you may make a complaint in the manner described below.

### How to make a complaint

If you wish to complain to us about how we have handled your personal information, you should contact us in writing using the details below and provide details of your complaint.

Complaints or concerns regarding our handling of your personal information will be fully investigated and actioned appropriately.

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You may also approach an independent advisor or contact the Office of the Australian Information Commissioner ([www.oaic.gov.au](http://www.oaic.gov.au)) for guidance on alternative courses of action which may be available.

## Contact us

You can contact our Privacy Officer in respect of any of the matters raised within the Policy, including complaints and requests for access to or correction of personal information at:

Privacy Officer  
RSL Victoria  
4 Collins Street, Melbourne 3000  
(03) 9655 5555  
Email: [polgov@rslvic.com.au](mailto:polgov@rslvic.com.au)

## UPDATING THIS POLICY

We may change this policy from time to time. Any updates to this Policy will be available on our website.

A copy of this Policy can be obtained upon request to the Privacy Officer.

## ENDORSEMENT & REVIEW

Date of Endorsement	Endorsed By	Review Date	Version
19-12-2023	State Executive (STEX)	19-12-2023	1.1

## POLICY AUTHOR

Executive General Manager Strategy, Governance and Policy