

1. Purpose And Outcome

The A Path To Follow Inc. (APTF Inc.) is committed to protecting the privacy of both Consumer and Workforce Peers and comply with all relevant Privacy legislation.

The purpose of this policy is to summarise the obligations APTF Inc. has undertaken to control and protect Personal, Sensitive and Health Information (as defined below). APTF Inc. is bound by the Privacy Act 1998 (Cth) and its amendments and must, unless a statutory exemption applies, comply with the Australian Privacy Principles ("APP"). It is also bound by similar State legislation and privacy principles.

2. Scope Of Application

This policy applies to personal, sensitive and health Information (as defined below) related to APTF Inc. Consumer Peers (clients), Employees, Volunteers, Contractors, Suppliers and Third Parties that is collected and stored as part of APTF Inc. Inc's daily practices.

3. Definitions

"Personal Information" refers to information or an opinion that can be used to reasonably identify an individual. Personal Information can be true or false, verbal, written or photographic, recorded or unrecorded. What constitutes 'personal information' will vary depending on circumstances.

"Sensitive Information" is a special category of personal information and has more particular Privacy Law obligations for collection, storage and use. Under the Privacy Laws, information will generally be considered 'sensitive information' where it is personal information more specifically about a person's: racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal records or health (defined separately below) and financial information. Different requirements and thresholds apply to this kind of information under Australian Privacy Laws.

"Health Information" is a type of personal and sensitive information that is defined broadly to include information or opinion about matters such as mental health, disability (at any time), health preferences (including future provision of health services), use of health services, bodily donations (e.g. blood, organs), genetics and allergies.

The term "Private information" will be used to collectively refer to personal, sensitive or health information.

4. Collection Of Information

APTF Inc. does not collect or process any private information unless it is considered necessary for APTF Inc.'s effective functioning. The introduction to APTF Inc.'s Constitution provides guidance as to the purpose and functions of the APTF Inc.

APTF Inc. collects, holds and uses private information so that it can perform its activities and functions effectively and to provide the best possible service.

APTF Inc. does not collect and/or process any private information against the express wishes of an individual, unless it is required by law to do so.

Generally, APTF Inc. collects private information directly from the individual or a child's parent/guardian/carer using open, fair and reasonable means.

APTF Inc. may collect and hold the following types of private information:

- name;
- mailing or street address;
- email address;
- telephone number;



- age or birth date;
- profession, occupation or job title;
- other engaged service details
- mental health histories
- family details, including ancestry and children, if any; and
- any additional information relating to a Consumer Peer that is provided.

APTF Inc. may also collect some information that is not private information because it does not identify an individual. For example, it may collect anonymous answers to surveys or aggregated information about how users use its website.

If an individual does not provide their private information, APTF Inc. may not be able to provide service.

Individuals have the right to remain anonymous when entering into transactions with APTF Inc., unless such anonymity would be considered unlawful or impracticable.

APTF Inc. takes reasonable steps to ensure that any private information collected is kept accurate and up-to-date.

Photographs taken at APTF Inc. or partner community events may be used in APTF Inc. publications, including the public and private sections of the APTF Inc.'s website, without individual identification. Permission will be sought before using photographs with individual identification. Photographs of children under the age of 16 will not be published in public domains without the consent of a parent or guardian.

Where private information is collected from a third party (such as from a former employer or the police), the individual will be notified that such private information has been obtained from the third party and the purpose for which it was collected, where this is not evident.

5. Storage Of Information

Information obtained from and/or about Consumer Peers (clients), volunteers and Workforce Peers (employees) will be recorded in HubSpot, APTF Inc.'s data management system and WAVE, APTF Inc.'s invoicing system. HubSpot and WAVE both have their own privacy and terms of use. APTF Inc. make use of HubSpot to also track information emailed and if that email has been received and opened. Consumer Peers are able to opt out of this, upon request. Further information can be obtained at [Hubspot Privacy Policy](#) and at [WAVE Privacy Policy](#).

Information relating to service providers and non-private information will only be stored in the APTF Inc.'s private computer systems and google drive.

APTF Inc. takes reasonable steps to ensure that private information stored is protected from misuse, loss and unauthorised access, modification and disclosure, increasing the level of security for sensitive and health information.

All computers will have access passwords and programs passworded to limit access. All Workforce Peers are also asked to utilise Bitwarden software for all other password protection.

Consumer Peer forms and other written information concerning them will be stored in HubSpot. Only APTF Inc. Workforce Peers, and those with express permission, will have access to this system. APTF Inc. Workforce Peers with access to an individual's private information are bound by duties of confidentiality.

When a person ceases to be a registered APTF Inc. Peer or otherwise associated with the APTF Inc., the individual's private information may be kept for archival purposes, but no other use may be made of it without the prior written approval of that individual or, in the event the individual cannot be contacted, their family.



6. Disclosure Of Specific Private information

APTF Inc. may disclose an individual's private information to its Workforce Peers and volunteers for the purposes of its operation.

APTF Inc. does not use, share with or disclose to others any private information without the consent of the individual(s) concerned or, in the case of a child under 16 or a client unable to provide consent, the consent of a parent/guardian/carer.

With respect to any disclosures of private information to third parties, the APTF Inc. will take reasonable steps to ensure the third party is aware of the APTF Inc.'s obligations under the privacy laws and undertakes to comply with such obligations.

7. Maintenance Of Information

APTF Inc. will endeavour to maintain the accuracy and currency of the information that it holds. Individuals are encouraged to advise the APTF Inc. of changes to their private information.

8. Access To Information

Individuals have the right to access their private information where:

- i. such private information does not relate to existing or anticipated legal proceedings;
- ii. an individual gives reasonable notice of the request;
- iii. the private information is viewed and remains in the APTF Inc. or specific employee offices; and
- iv. the request is not considered frivolous, vexatious, unlawful or would interfere with the privacy of others.

If it becomes clear during the execution of the individual's right of access that private information is not accurate, complete or up-to-date, the individual should request that the incorrect private information be corrected.

Formal applications for personal data access or any concerns or a complaint regarding the treatment of an individual's privacy or a possible legislative breach should be directed to the Operational Director, as per details below.

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