



Anglicare WA Friend in Need App Privacy Policy

1 Introduction

Anglicare WA (ABN 32 797 454 970) (**'we,' 'us'** and **'our'**) is committed to ensuring the confidentiality and security of the personal information we collect and store when you access or use the Anglicare WA Friend in Need App (**App**).

This Privacy Policy outlines how we collect, use, disclose and protect your personal information, as required by the *Privacy Act 1988* (Cth) (**Privacy Act**). It also outlines how you can access and change your information, ask a question or make a complaint. Whether or not the Privacy Act applies to your personal information that we collect or hold, we will comply with this Privacy Policy.

By accessing or using the App you agree that we can handle your data as stated in this Privacy Policy and that you will be bound by the Terms and Conditions of Use available at www.anglicarewa.org.au.

2 Collecting personal information

2.1 What is personal information?

Personal information is information that identifies you as an individual or information from which you can be reasonably identified.

We have designed the App so that it collects very little information about you. In many cases, the information you enter into the App will not be able to identify you if you choose. For example, you may use the App as a guest without needing to input details such as your name, year of birth or postcode.

2.2 What personal information do we collect through the App?

When you use the App, you have the ability to enter certain information. If you choose to enter it, we will collect your:

- (a) first name and last name;
- (b) year of birth;
- (c) postcode; and
- (d) email address.

We may also collect other information about you that you provide to us directly or indirectly.

2.3 What is the purpose of collecting personal information?

We only collect personal information that is reasonably necessary for our functions and activities. For example, we may use your personal information to provide you with the App, and to develop content for, improve, maintain and personalise the App. We may also use your personal information for ancillary purposes such as analytics, and generally in the process of providing a quality service and experience while you access or use the App.



We will only provide your personal information entered into the App to third parties as set out in section 3. We will take reasonable steps to ensure that any such third party treats your personal information in accordance with the terms of this Privacy Policy.

2.4 **How do we collect personal information?**

We can only collect personal information about you in ways that are lawful and fair. We largely collect information from you directly, such as when you create a profile in the App. You may restrict the personal information you provide to us by choosing not to create a profile and using the App as a guest.

2.5 **How do we collect non-personal information?**

- (a) The App uses Google Analytics for Firebase for monitoring usage and user engagement. This means that we will be able to access aggregated, non-identifying data based on the information of all users of the App, including your information. Such information may include:
- (1) usage statistics, such as the version of the App users are using to access the App, when users access the App, and the city, continent, country or region from which users access the App;
 - (2) information about how users use the App, including when users update the app, click on a link that takes them away from the current domain, download content from the App, dismiss a notification, or scroll to the bottom of an article;
 - (3) information about users, including users' age brackets, interests and genders; and
 - (4) information about the device users use to access the App, including the model of the devices users access the App with and the operating systems of those devices.
- (b) If you choose to provide us with personal information by using the App, the information we collect through Google Analytics for Firebase about you, or how you access or use the App may reasonably identify you.
- (c) Our use of Google Analytics for Firebase complies with the Google Analytics for Firebase Use Policy (<https://firebase.google.com/policies/analytics>).
- (d) Use of the App is conditional upon you agreeing to our use of these analytics tools. If you do not want us to monitor your usage of the App using Google Analytics for Firebase, you must not use the App

3 **How we use and disclose your personal information**

3.1 **How we use and disclose your personal information**

We only hold, use and disclose personal information about you for the purposes stated in section 2.3, or for related purposes that might be reasonably expected, unless you provide your consent to use for other purposes.

Such disclosure may include disclosure of your personal information to third parties who:

- (a) are our service providers (such as web hosting or data storage providers);
- (b) are regulatory bodies, government agencies, law enforcement bodies or courts;
or
- (c) are your authorised agents, executors, administrators or legal representatives.

We may also hold, use and disclose your personal information in connection with suspected fraud, misconduct and unlawful activity



We may also be required to disclose your personal information by law.

3.2 **Overseas transfer of information**

Your personal information may be disclosed, transferred, stored, processed or used overseas by us, or by third party service providers. For example, we store and process your information in a secure environment hosted in The United States of America.

By using the App, you consent to the collection, use, storage and processing of your personal information in The United States of America. There may be applicable data protection laws in The United States of America which give you rights in respect of your personal information. However, other than in Australia, the Privacy Act will not apply to how those parties treat your personal information.

4 **Keeping personal information secure**

We have security measures in place to protect your personal information that we hold. We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure.

We may hold your information in either electronic or hard copy form. We implement security measures (including encrypting your information where appropriate) to ensure the physical security of personal information held on our premises and systems. When records containing personal information are no longer required, we delete the information or permanently de-identify it.

However, as the App is provided through the Internet, we cannot guarantee the security of transmission of information you communicate to us. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the Internet. Accordingly, any personal information or other information that you transmit to us is transmitted at your own risk.

5 **Access and correction of personal information**

5.1 **Access**

You have the right to access the personal information we hold about you. You have the right to access that information in any reasonable and practicable manner that you request.

If you make a request, we will need to validate your identity so that we do not provide your information to someone else.

We will provide you with access to the requested information within 30 days if it is reasonable and practicable to do so, but in some circumstances it may take longer.

If we refuse access, we will explain our decision to the extent practicable and your options to make a complaint.

We will not usually charge you for access to your personal information. However, if the request is complex, we may charge you our cost of providing the access, such as the cost of our staff locating and gathering information.

To contact us to access the personal information we hold about you, please use one of the methods stated in section 6 below.

5.2 **Correction**

You can tell us at any time if any of the personal information we hold about you is incorrect, inaccurate or incomplete and you want us to correct that information.



If you would like to do so please contact us using the contact details in section 6 below.

We will normally respond to correction requests within 30 days, but in some circumstances it may take longer.

We will not charge you any amount to correct your personal information held by us.

If we do not agree that your personal information needs to be corrected or changed, then we will add a note to the personal information stating that you disagree with it.

You can also correct any information stored in your profile yourself on the profile settings page in the App.

6 Privacy contact

If you believe that we have not complied with our obligations relating to your personal information, or if you would like access to your personal information, please contact us using the following details:

By phone:

1300 11 44 46 between 9:00am and 4:00pm Monday to Friday; or

By mail:

General Manager – Practice Excellence
Anglicare WA
GPO Box C138 Perth WA 6839.

By email:

at complaints@anglicarewa.org.au

If you feel we have not properly dealt with a complaint, you may contact the Office of the Australian Information Commissioner at enquiries@oaic.gov.au or on 1300 363 992.

7 Updates

We may review and amend this Privacy Policy from time to time to address changes to laws and to reflect our current operations and practices.

You can obtain a copy of the current version on request.

Last updated: [November 2021]