



MENTAL HEALTH MOVEMENT

PRIVACY POLICY

Last updated November 2019



#STARTINGTHECONVERSATION

Mental Health Movement values the relationship we have with our clients and their employees and we believe in protecting the confidentiality and security of individuals' personal information.

We are committed to ensuring the privacy of your personal information, Mental Health Movement is bound by the Privacy Act 1988 (Cth) and the Australian Privacy Principles.

The Australian Privacy Principles are designed to protect the confidentiality of information and the privacy of individuals by regulating the way personal information is collected, used, disclosed and managed. Personal information is information or an opinion relating to an identified, or reasonably identifiable, individual.

We are committed to being open and transparent and as such this policy explains the types of personal information that we may collect and hold, how that information is used and with whom the information is shared. It also sets out how you can contact us if you have any queries or concerns about this information.

Meanings

References to "Mental Health Movement", 'us' or 'our', 'we' are references to Mental Health Movement Pty Ltd, ABN 90 150 375 465.

'Personal information' is information that directly identifies you, such as your name and email address, or data that could be used, on its own or in combination with other data, to identify you. It has the meaning given to it in the Act. Sensitive information is personal information requiring special protection and includes information about your health.

Mental Health Movement use your personal information for the delivery of our services, and to send you updates or marketing material about our services. We never sell or give away your personal information.

This policy covers both our service delivery and our website.

COLLECTION

Mental Health Movement will only collect personal information about an individual or a business where the collection is reasonably necessary for one or more of our functions or activities.

We collect two distinct types of personal information:

1. information relating to our commercial clients/suppliers and the contact people in those organisations; and
2. information about individuals who consent to providing personal information to us (including sensitive information) as part of Mental Health Movement providing services to those commercial clients (such as from employees or contractors of those clients)

Types of information collected

To enable us to deliver our services to you, it is necessary for us to collect and store your information. The information Mental Health Movement collects will include:

- contact details, such as your name, address, email, telephone numbers, job title
- Opinions via surveys and questionnaires
- We may also collect personal information, including sensitive information, from you if required by the services we are performing for our clients. This can include health information which will be only collected with your consent.

For commercial clients, credit information may also be collected for establishing a client account with us (but this will usually be corporate and commercial, rather than personal, information).

Mental Health Movement may collect statistical information about visitors to our website using web analytics and session recording technology provided by third party service providers such as Google Analytics. These services use Cookies to assist us in understanding how visitors' access and utilise our site. Generally, this information cannot be used to identify particular individuals. However, in some circumstances it may include a visitor's internet protocol (IP) address, which could be linked to an individual.

Collection method

The main way we collect personal information about you is:

- when you contact us
- when you submit information to our website or in person (eg feedback form)
- when you talk with us in person

Sensitive information

Sensitive information is subject to greater restrictions. In general, employees should attempt to limit the collection of sensitive information from individuals. However, sensitive information may need to be collected in order to deliver certain services. Mental Health Movement will only collect sensitive information from or about an individual if it is necessary to deliver a service to that individual.

In some instances, some of the information we collect may be 'sensitive information', including information or an opinion about an individual's health, among other things. Mental Health Movement may use and disclose your sensitive information for the primary purpose of collection, or for reasonably expected secondary purposes which are directly related to the primary purpose, or for purposes to which you have consented and in other circumstances authorised by the Privacy Act (eg where required or authorised by law to be disclosed, or where disclosure is necessary to prevent a threat to life, health or safety).

Anonymity

Individuals can engage with Mental Health Movement on an anonymous basis or using a pseudonym. If an individual makes this request, and Mental Health Movement does not need his or her personal information to deliver the service or program, it should not be collected. You can browse our website anonymously (although cookies may identify your IP address).

However, if you use, request information or engage in any of our services, remaining anonymous may impact our ability to be able to provide you with requested information or to deliver our products or services.

Unsolicited personal information

Where an individual provides personal information that has not been solicited by Mental Health Movement, the employee who receives that information should determine whether it is reasonably necessary for one or more of Mental Health Movement's functions or service delivery. If it is not, the information should be destroyed as soon as is practicable.

Website usage information and cookies

Mental Health Movement may use a range of tools provided by third parties including search engine browsers and our web hosting company, to collect or view website traffic information. We may also use cookies and session tools to improve your experience when accessing our websites and tracking cookies or remarketing pixels for analytical and advertising purposes.

Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. Some website features may not function properly without cookies.

The kind of information that can be collected includes:

- device specific information such as mobile network information
- server logs including your IP address, the times you use our services and system activity
- location information including IP address, GPS, and Wi-Fi access points

We use the information to help to track your use of our online services to improve your user experience and the quality of our services.

USE & DISCLOSURE

Mental Health Movement may use and disclose your personal information for the primary purpose of collection, or for reasonably expected secondary purposes which are related to the primary purpose, or for purposes to which you have consented, and in other circumstances authorised by the Privacy Act.

Generally, Mental Health Movement may use and disclose your personal information for a range of purposes, including to:

- provide you with our products or services that you have requested, for example conducting education and training in suicide prevention, crisis support and mental health management to individuals and organisations;
- respond to your queries or feedback;
- provide you with any communications or publications in which we think you might be interested, or which you have requested;
- let you know about developments in our procedures, products, services, activities and programs that might be useful to you;
- we will use your information for recalls or follow up visits;
- conducting research and evaluation and assurance activities to ensure the delivery of quality services and achieve continuous improvement in business delivery including, but not limited to, our program standards, our business systems, processes, outcomes, communication, website, engagement and performance;
- facilitate your participation in our services in various capacities, including but not limited to workshops, educational events, social events;
- we use it for administrative and billing purposes;
- managing your employment with us if you are an employee;
- conducting investigations, and managing responses, in relation to complaints concerning Mental Health Movement and our services;

We will also share your personal information (eg. contact details) for business purposes including:

- third party suppliers we engage to provide services which involve processing data on our behalf, for example IT and system administration services (including cloud

computing service providers), website developers. In this case, we will require them to use that information only for the purpose of providing the services we have requested, and in compliance with the provisions of this privacy policy (or equivalent standards);

- we will share your health information with authorised health practitioners within our business;
- professional advisers including accountants, lawyers, bankers, auditors and insurers for the compliant operation of our business;
- third parties where we are required to in accordance with the law. We reserve the right to fully co-operate with any law enforcement authorities or court order requiring or requesting us to disclose the identity or other usage details of any user of our online services, or in accordance with a properly executed court order, or as otherwise required to do so by law.

Mental Health Movement do not sell or license your personal information to third parties.

Cross-border disclosures

Mental Health Movement may use data hosting facilities or enter into contractual arrangements with third party service providers to assist with providing our goods and services. As a result, personal information provided to Mental Health Movement may be transferred to, and stored at, a destination outside Australia, including but not limited to United States, Germany, Japan, Singapore and Hong Kong.

Direct Marketing

Individuals whose personal information is collected using a collection notice that references this Privacy Policy are taken to consent to the use of their personal information for direct marketing purposes, unless they have specifically opted out.

Mental Health Movement may send you direct marketing about our products or services. You may always opt out of receiving this marketing by letting us know. Opting out of marketing will have your details removed from our marketing list but will not change the way we use other personal information we hold about you. For example, you may still receive reminders about upcoming workshops or appointments.

DATA SECURITY

Maintaining security of personal information

Mental Health Movement will take reasonable steps to help ensure the security of personal information we hold. This also includes from misuse and loss, and from unauthorised access, modification or disclosure. The ways we do this include:

- Making sure that personal information is accurate, complete and up to date;
- limiting access to the information we collect about you (for instance, only those of our personnel who need your information to carry out our business activities are allowed access);
- requiring any third-party providers to have acceptable security measures to keep personal information secure;
- putting in place physical, electronic, and procedural safeguards in line with industry standards;
- If we no longer require your personal information and are not legally required to retain it, take reasonable steps to destroy or permanently de-identify the personal information.
- Our website may contain links to third party websites. We do not operate these websites and therefore are not responsible for the collection or handling of personal information by the operators of these websites.

Responding to a data security breach

The Privacy Officer is responsible for responding to the unauthorised access or disclosure of personal information in a manner which constitutes a data security breach. The exact nature of the response will depend on the circumstances but is likely to include:

- Taking reasonable steps to contain the data security breach;
- undertaking a preliminary assessment of the data security breach
- where appropriate following the results of that assessment, implementing appropriate changes

Where required by law, the Privacy Officer will notify the Australian Information Commissioner and will assist employees to notify individuals affected by a data security breach.

ACCESS AND CORRECTION

Access

You have the right to know what information we hold about you and to ensure the information is accurate and up to date. To make a request to access this information, please contact us in writing. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. For record keeping purposes, we will record and store all information exchanged during an exercise of your rights under this clause.

Correction

We endeavour to ensure that the personal information we hold about you is accurate, complete and up-to-date. Please contact Mental Health Movement at the contact address set out below if you believe that the information we hold about you, requires correction or is out-of-date.

MINORS

Mental Health Movement makes no active effort to collect personal information from children under the age of 18.

UPDATES TO THIS POLICY

This Privacy Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and the changing business environment. The current version of this Privacy Policy has been last update in November 2019.

Updated policy will be displayed on our website.

CONCERNS & DISPUTES

Respecting your privacy is very important to us and we make every effort to ensure this occurs. However, if you believe we have breached your privacy rights in any way, or you would like to discuss any issues you may have with our privacy policy we urge you to contact:

Privacy Officer
Mental Health Movement
10 63 Market St, Wollongong, NSW 2500
Email: info@mentalhealthmovement.com.au

If we do not answer your concerns to your satisfaction you have the right to make a complaint to the Privacy Commissioner. The Privacy Commissioner's contact details are available at www.oaic.gov.au.