

Privacy Policy

1. Purpose

This privacy policy explains why My Place collects your personal information and what My Place does with it, along with your rights to access and correct your personal information and how to make a privacy complaint.

My Place is bound by laws governing how My Place may collect and use your personal information including the *Privacy Act 1988* (Cth) (**Privacy Laws**).

References in this policy to “My Place” includes My Place WA Ltd and other related entities, where the context requires.

2. Personal information and sensitive information

In this privacy policy you will see the terms ‘personal information’ and ‘sensitive information’ used. These terms have the following definitions:

- **personal information** means information that identifies you or can be used to identify you, or from which you are reasonably identifiable.
- **sensitive information** is a sub-set of personal information and includes information about your health, health services provided to you and your claims. Sensitive information is more protected under Privacy Laws than are other forms of personal information.

In this privacy policy, and unless otherwise stated, all references to 'personal information' include 'sensitive information'.

3. Who this privacy policy applies to

This privacy policy applies to:

- All current and past Consumers of My Place whose personal information My Place has collected.
- All individuals whose personal information is collected in relation to the services and programs offered by My Place.
- All individuals whose personal information is collected by My Place in the course of our services, functions and activities, such as service providers, contractors and prospective employees.

4. Types of personal information My Place may collect

The types of personal information My Place may collect depends on My Place's relationship with you, and may include:

- a. identifying information such as name, date of birth and employment details;
- b. identification information for identity verification, such as your driver's licence;
- c. contact information such as home address, home and mobile phone numbers and email address, and in some cases your work contact details;
- d. government-issued identifiers including NDIS Participant numbers and Medicare numbers;
- e. financial information, such as bank account details;
- f. sensitive information, including:
- g. information about your health, disability, health services provided to you and your funding claims;
- h. biometric information and templates;
- i. lifestyle and health related information;
- j. other sensitive information - such as your race and ethnicity where we are required to collect it;
- k. information about your activities, including sporting and other lifestyle interests;
- l. information about involvement in other programs you participate in;
- m. your IP information to detect unauthorised access to your iPlace account and identify potential fraud and criminal behaviour; and
- n. information about your usage of the My Place website and iPlace for the purposes of analytics (including when you use the My Place website and iPlace and what you do, and the information you input, while using them).

To gain this information My Place will use cookies.

5. Why My Place needs information which identifies you

You generally have the right not to identify yourself when dealing with My Place, where it is lawful and practicable for us to allow it. However, in many instances My Place will need your identity details.

If you do not provide or authorise the provision of personal information My Place requests, My Place may be unable to provide you with some or all of our services. If you ask My Place, then My Place will tell you what personal information My Place must have in order to provide you with a particular service, and what requested personal information is optional for that service.

Subject to the applicable Privacy Laws, by becoming or remaining a Consumer or by otherwise providing personal information to My Place, you confirm that you have consented to us collecting, using and disclosing your personal information, however collected by us, in accordance with this privacy policy (as amended and notified to you from time to time).

6. Why My Place collects your information

My Place collects your personal information to enable My Place and our third party suppliers and partners to provide you with services as a disability support provider. My Place may also be required by law to collect some personal information. Where you provide personal information to My Place as a service provider, contractor or prospective employee, My Place collects your personal information to enable it to fulfil the purpose and related purposes for which you provided the information.

7. How My Place collects your information

My Place will only collect personal information about you by lawful and fair means. My Place may collect personal information from you at various times, including when you complete an application form or other type of form in relation to our services, when you use iPlace, when you make an NDIS claim or when you contact us.

My Place may collect your personal information from you, from a person authorised to provide My Place with your personal information on your behalf, or from an agency or organisation who is funding you to access My Place's services (for example, the National Disability Insurance Agency).

My Place may also collect information about you from other sources, such as:

- a third party such as a hospital, therapist or psychologist or other health service provider who has treated you;
- an employer, educational institution, government agency or adviser who has dealt with you (or their authorised representatives); and
- a service provider engaged by My Place or a third party who partners with My Place to assist in providing services or administering My Place's business.

8. Why My Place may share your information

My Place may be required to share your information with the National Disability Insurance Agency to enable you to access and continue participating in the National Disability Insurance Scheme, or with another Government agency or service provider. My Place will only share information as is reasonably and legally required to facilitate the provision of services to you.

9. My Place will hold your information

My Place aims to store your information securely and have a range of security controls in place (including physical, technical and procedural safeguards) designed to protect your personal information. My Place takes reasonable steps to make sure that the personal information about you - that My Place collects, uses and discloses - is accurate, complete, up-to-date and relevant.

10. Keeping and disposing of your information

My Place endeavours to keep your personal information for only as long as it is required in order to provide you with services or to legitimately comply with My

Place's business and legal obligations and requirements. When it is no longer needed for these purposes, My Place may destroy or permanently de-identify this personal information. Consequently, if you request access to your old personal information, My Place will not be able to provide you with your records if they have been destroyed or de-identified.

11. Accessing your information

You can ask My Place for access to the information held about you at any time. My Place will endeavour to respond in a reasonable time, being within 30 days and as soon as is reasonably possible.

My Place will generally not charge a fee for accessing your personal information. My Place will only charge a fee to access information in exceptional circumstances, and where your request is particularly onerous. My Place will let you know in advance of levying any fee to confirm that you still wish to proceed with your request.

When you contact My Place to seek access to your personal information, we will need to be reasonably satisfied it is you and not an unauthorised person. You may be required to verify your identity.

My Place may not always give you access to certain information you have requested, such as where:

- My Place no longer holds or uses the information and have destroyed or de-identified it;
- providing access would be unlawful;
- My Place is required or authorised by law to deny access;
- providing access would unreasonably impact on the privacy of others; or
- My Place cannot be satisfied that you are who you say you are (My Place cannot adequately identify you).

12. If your personal information is hacked or inadvertently disclosed

If My Place becomes aware that it has inappropriately used or disclosed your personal information, or that the security of your personal information has been compromised (**Data Breach**), and My Place is unable to rectify the Data Breach without any potential adverse effect on your privacy, My Place may contact you to inform you, and to work with you to minimise or mitigate the consequences of the Data Breach.

Pursuant to the Notifiable Data Breaches scheme (under Part IIIC of the *Privacy Act 1988*), My Place may be required to notify you of a Data Breach as soon as it practicably can, if My Place considers you are reasonably likely to be at risk of serious harm (including financially or to your mental or physical wellbeing).

Where reasonably practicable, My Place will give you details of the Data Breach and, where possible, steps you could take to lower the risk of harm to you. My Place may

make a public notification for a Data Breach affecting a large number of Consumers, employees or other persons connected to My Place, before My Place contacts you directly or in place of direct contact.

13. Contact us if you have concerns about My Place's collection, use or disclosure of your personal information

If you have any concerns or queries about the manner in which your personal information has been handled, please contact My Place's Legal Counsel, whose contact details are provided below.

If you wish to make a formal complaint, please provide your complaint in writing to My Place's Legal Counsel, and detail information relevant to your complaint. Please note that My Place will receive and action your request faster if you email it to us using the details below.

My Place WA Ltd
Attn: Legal Counsel
PO Box 869
SUBIACO WA 6904

or

myplace@myplace.org.au

Generally, My Place will contact you to acknowledge receipt of your complaint and let you know who is managing your query within 5 business days of receiving it.

If My Place has not responded to you within a reasonable time, or if your complaint is not resolved to your satisfaction, you are entitled under the *Privacy Act 1988* (Cth) to make a complaint to the Office of the Australian Information Commissioner and can find more information on the Commission's website www.privacy.gov.au.