

BILAEMPOWER LTD PRIVACY POLICY

1. ABOUT THIS POLICY

- 1.1 This Privacy Policy (**Policy**) applies to BilaEmpower Ltd (ACN 674 554 557) ("**BilaEmpower**", "**we**", "**our**" or "**us**"), and describes how we collect, handles and protect the privacy of your personal information.
- 1.2 BilaEmpower is an Indigenous not-for-profit Charity which provides a range of goods and services that promote wellbeing and healing, and therapeutic and entrepreneurial support. BilaEmpower aims to support and empower the wider community, and educate the public about the culture of First Nations peoples through the provision of various workshops and seminars.
- 1.3 We are committed to protecting your privacy and understand the importance of protecting your personal information. This Policy outlines the types of personal information that we usually collect, the purposes for which we collect it, to whom we disclose it, how we hold and keep it secure, and your rights in relation to your personal information, including how to complain and how we deal with complaints.
- 1.4 We will handle your personal information in accordance with this Policy, legislation including the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**).
- 1.5 In this Policy, **personal information** means any information or opinion about an identified individual or an individual who is reasonably identifiable, whether true or not. It does not include information that is de-identified.
- 1.6 This Policy is current as at September 2024. We may change this Privacy Policy from time to time, by updating the policy on our website.

2. TYPES OF PERSONAL INFORMATION WE COLLECT

- 2.1 The types of personal information we collect about you depends on the dealings you have with us, but would generally include:
 - (a) contact details (including your name, address, email address and phone number);
 - (b) biographical information (including your age, gender, and whether you are of Aboriginal and/or Torres Strait Islander descent);
 - (c) information about your dealings with us (including any enquiries you submit by email or through our website);
 - (d) details of the products and services we have provided to you or that you have enquired about, including any additional information necessary to deliver those products and services and respond to your enquiries;
 - (e) photographs and videos of you taken during our provision of services to you, with your permission;
 - (f) information you provide to us in surveys or questionnaires;
 - (g) billing information;
 - (h) financial information (including your bank or credit card account details for invoicing and payment purposes); and
 - (i) any other personal information that may be required to facilitate your dealings with us (such as your NDIS participant number, where applicable).
- 2.2 If you are applying for a job or to be volunteer with us, we may also collect your:
 - (a) employment and/or volunteer history and qualifications;
 - (b) tax file number;

- (c) references;
- (d) medical information;
- (e) superannuation fund details; and
- (f) criminal history record.

2.3 If you are engaging in our health services, we may also collect health information about you as necessary to provide services to you, which may include:

- (a) medical history and details of any current illness, injury or condition; and
- (b) health services currently being received (including details of the practitioners who provide those services) and those to be provided.

3. HOW WE COLLECT YOUR PERSONAL INFORMATION

3.1 We will collect personal information only by full and fair means and not in an unreasonably intrusive way. We may collect personal information from or about you in different ways, including:

- (a) from you directly when you interact with us, e.g. from our discussions with you, when you complete a form, register an account, sign-up for newsletters, submit an online enquiry, purchase goods or services from us or otherwise interact with us via phone or email; and
- (b) through third parties with whom we interact in order to provide our services.

4. PURPOSES FOR WHICH WE COLLECT, USE AND DISCLOSE PERSONAL INFORMATION

We collect your personal information for the following purposes:

- (a) to provide our goods and services to you;
- (b) to respond to your enquiries;
- (c) to provide you with newsletters, marketing and promotional information about us or affiliated products or services;
- (d) to communicate with you about future workshops, events and other services provided by us;
- (e) to conduct general business and management functions;
- (f) to obtain your feedback;
- (g) to help us manage, develop and enhance our services, including our websites and applications; and
- (h) to comply with our legal obligations, resolve any disputes and enforce our agreements and rights with third parties.

5. DISCLOSING YOUR PERSONAL INFORMATION

5.1 We may disclose your personal information for the purpose for which it was collected (or a related secondary purpose) and otherwise where permitted or required by law or with your consent.

5.2 In the course of providing our products and services to you, we may disclose your personal information and the personal information of any third parties you provide to us, in the following circumstances:

- (a) where third parties assist us in the provision of our services, processing payments or performing operational, administrative and other related functions on our behalf;
- (b) our professional advisers, including lawyers, accountants and auditors; or
- (c) government agencies, regulatory bodies and law enforcement agencies, or other similar entities.

5.3 We engage third parties to provide information technology services to us. In limited circumstances, these third parties may have access to your personal information for purposes connected with the provision of their services. These third parties include our website administrator, Stripe (payment processing), Square (payment security), Zoom, Microsoft Teams, or Signal. Some of these third parties may be located overseas.

6. DIRECT MARKETING

- 6.1 We may use your personal information to identify a product or service that you may be interested in or to contact you about a particular event or workshop. We may, with your consent, use the personal information we have collected about you to contact you from time to time whether by *email* or *SMS* to tell you about new workshops or services that we believe may be of interest to you.
- 6.2 You can withdraw your consent to receiving direct marketing communications from us at any time by unsubscribing from the mailing list by using the 'opt-out' mechanism in our correspondence with you, or by contacting us using the details set out in this Policy.

7. SECURITY AND STORAGE

- 7.1 We store your personal information in hard copy and electronically. Information in hard copy format is stored in a locked filing cabinet, and electronic information is stored on our encrypted case management system. We take all reasonable and appropriate steps (including organisational and technological measures) to protect your personal information from misuse, interference and loss, as well as unauthorised access, modification or disclosure.
- 7.2 We only keep your personal information for as long as it is required for the purpose for which it was collected or as otherwise required by applicable laws. If we no longer need to hold your personal information for any reason or we are no longer required by law to keep it, we will take reasonable steps to de-identify or destroy that information. These steps may vary depending on the nature of the information, the way it was collected and how it was stored.

8. ACCESS TO AND CORRECTION OF YOUR INFORMATION

- 8.1 You may request access to, or correction of, the personal information we hold about you at any time by contacting us using the details in the 'Contact Us' section below. We will need to verify your identity before responding to your request. Subject to any applicable exceptions or requirements, we will provide you with access to the personal information you request within a reasonable time and usually within 30 days. If we decide to refuse your request, we will tell you why in writing and how to complain if you are not satisfied with our decision.
- 8.2 We will use reasonable endeavours to ensure that the personal information collected from you is up to date, accurate and complete.

9. CONTACT US

- 9.1 If you have a question or comment regarding this Policy or wish to make a complaint or exercise your privacy rights, please contact us on the following details:

Attention: Bianca Stawiarski,
Email: info@bilaempower.org

- 9.2 If you make a complaint, we will respond to you within a reasonable period of time to acknowledge your complaint and inform you of the next steps we will take in dealing with your complaint.
- 9.3 If you are not satisfied with our response, you may complain to the Office of the Australian Information Commissioner (**OAIC**) via the OAIC website, www.oaic.gov.au.

Dated: September 2024