



LEGACY AUSTRALIA INCORPORATED

PRIVACY POLICY

1. BACKGROUND

- 1.1. This Privacy Policy summarises how Legacy Australia Incorporated (ABN 59 203 621 448) (**LA Inc, we, us or our**) handles your personal information in the performance of its business activities.
- 1.2. LA Inc. recognises the importance of respecting your privacy when collecting, using, disclosing and managing your personal information under the *Privacy Act 1988* (Cth) (**Privacy Act**).
- 1.3. In this Privacy Policy, **personal information** has the meaning given to it in the Privacy Act. Generally, it includes information or an opinion about an identified individual or an individual who is reasonably identifiable, whether the information is true or not, or whether the information is recorded in a material form or not. This may include your name, address, telephone number or email address.
- 1.4. This Privacy Policy applies to personal information collected by LA Inc. Our website may contain links to other sites.
- 1.5. We make no representations or warranties as to the privacy practices of any site operated by a third party and are not responsible for the privacy policies of such sites. Personal information managed by other member Legacy clubs in Australia may be governed by separate privacy policies. We encourage you to check the privacy policies of your local Legacy club for information about how they collect, manage and use personal information.

2. TYPES OF INFORMATION COLLECTED BY LA INC

- 2.1. Where relevant to our current business operations, LA Inc may collect the following types of personal information:
 - a) telephone number (both home and work);
 - b) full name (first, middle and last names);
 - c) e-mail address;

- d) postal address;
- e) date of birth;
- f) your membership history and details;
- g) if you are an employee, volunteer or a job applicant, your employment details (including your job title, training, skills and the information provided in your resumé and by your referees, former employers and educational institutions);
- h) financial details, including insurance policies (if applicable);
- i) if you apply to LA Inc for financial support, details relating to your financial situation and your health and family;
- j) your opinions or opinions about you (if applicable);
- k) details relating to the goods or services LA Inc has supplied to you and the events and activities in which you have participated;
- l) details relating to donations or bequests that you have made or would like to make;
- m) payment or billing information (including bank account details, credit card details, billing address and invoice details);
- n) user names and passwords for access to the members-only area of the LA Inc website; and
- o) health information and other sensitive information with your consent, which may include:
 - i. health records and health information (including, but not limited to, physical disability or mental health) which may assist in the processing of claims with the Department of Veterans' Affairs (**DVA**), Veterans' Review Board (**VRB**) or for seeking financial assistance through LA Inc; and
 - ii. information about criminal records. LA Inc promotes thorough screening of all Legacy representatives. This may include collecting, storing and disclosing of criminal records where consent has been provided for Criminal History Checks, Working With Children Checks or Working With Vulnerable People Checks.

2.2. LA Inc uses a secure encryption page for online credit card donations. Your credit card details are only used to process your donation and are securely stored by the provider of our electronic payment service.

Security

2.3. LA Inc takes reasonable steps to ensure that your personal information is protected from misuse and loss and from unauthorised access, modification, or disclosure.

Cookies and Google Analytics

- 2.4. LA Inc may collect personal information through the use of “cookies”. When you access our website, LA Inc may send a small electronic file containing a unique ID number to your computer – a cookie. The cookies used by LA Inc do not identify you and only identifies your computer. This enables LA Inc to keep track of products or services you view and to measure traffic patterns in order to determine which areas of our website have been visited and to measure transaction patterns in the aggregate. If you do not wish your computer to receive cookies, you can set your browser so that your computer does not accept them.
- 2.5. Data is collected for use in Google Analytics software to help improve website performance. Data is also used for remarketing and may be collected by Google Analytics Demographics, and Interest Reporting. The LA Inc website may make use of pixel tracking, which gathers data on visitor behaviour. These features use first party and third party cookies to inform and optimise content based on past visits to our website. Site visitors can opt out of customised Google Display Network services and Google Analytics for Display Advertising using Ad Settings. A Google Analytics Opt-out Browser Add-on is also available to prevent tracking in Google Analytics if desired.

Links

- 2.6. Our website contains links to other websites. Please be aware that LA Inc is not responsible for the privacy practices of other websites and you may wish to review the privacy policies on those websites if you visit them.

3. HOW LA INC COLLECTS AND HOLDS PERSONAL INFORMATION

- 3.1. LA Inc will collect your personal information directly from you where it is practicable to do so.
- 3.2. LA Inc may collect your personal information in a number of ways, including:
 - a) through application forms;
 - b) by email or other written mechanisms;
 - c) over a telephone call;
 - d) in person;
 - e) through transactions (e.g. donations);
 - f) surveys and questionnaires (if applicable);
 - g) through our website, including online donation portal;
 - h) by technology that is used to support communications between us;

- i) through publically available sources (which may include telephone directories and the internet);
 - j) through social media sites; and
 - k) from information providers such as direct marketing database providers and government entities.
- 3.3. We may also collect personal information about you from your authorised representative (if any) or from our related entities and other Legacy clubs.
- 3.4. You may also provide us with personal information about another individual. In such cases, you agree that you have obtained all necessary consents or authorisations required to share that individual's personal information with us.
- 3.5. Where LA Inc collects information from third party information providers, it will take reasonable steps to ensure that those marketing providers are compliant with the Privacy Act, *Spam Act 2003* (Cth) and this Privacy Policy.

4. PURPOSES FOR WHICH LA INC COLLECTS, HOLDS, USES, AND DISCLOSES PERSONAL INFORMATION

- 4.1. LA Inc will collect personal information if it is reasonably necessary for one or more of its business functions or activities. Click [here](#) for a list of other Legacy clubs or ask our Privacy Officer for a copy (see contact details below).
- 4.2. The purpose for which LA Inc collects, holds, uses or discloses personal information includes:
- a) verifying your identity;
 - b) assessing your eligibility for any benefits, products, or services provided by us or our representatives;
 - c) providing products and services to you;
 - d) responding to your requests for information;
 - e) answering enquiries and providing information or advice about existing and new products or services;
 - f) providing you with access to our website (including protected areas);
 - g) assessing the performance of our website and improving its operation;
 - h) conducting business processing functions;
 - i) administrative, marketing (including direct marketing), planning, product development, service development, quality control, and research purposes;

- j) facilitating or running group projects or programs with other organisations or government departments;
- k) maintaining employee records;
- l) coordinating and managing individuals who wish to volunteer with LA Inc;
- m) processing and managing donations or bequests left to LA Inc, including providing reimbursements (if any) and tax receipts;
- n) reviewing applications for financial support and, where applicable, providing financial support;
- o) stakeholder management;
- p) updating our records and keeping your contact details up to date;
- q) processing and responding to any complaint made by you or by others;
- r) complying with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, court, or tribunal; and
- s) co-operating with any government authority of any country.

4.3. LA Inc may also disclose or use personal information if you consent to such use or disclosure, or if LA Inc is so required or authorised to use or disclose your personal information under law.

5. Disclosure OF PERSONAL INFORMATION

5.1. Personal information collected by LA Inc may be disclosed to related entities or other Legacy clubs for any of the purposes set out in the paragraph above. LA Inc may also disclose your personal information to:

- a) its employees, volunteers, and contractors;
- b) related bodies corporate;
- c) other Legacy clubs;
- d) our affiliates;
- e) our contractors or service providers;
- f) charities or similar organisations;
- g) any organization with your express consent;
- h) a government agencies (including the Department of Defence, and Department of Veterans' Affairs) or other regulators; and
- i) any court or tribunal.

- 5.2. We may also combine or share any personal information that we collect from you with information collected by any of our related bodies corporate or other Legacy clubs (within Australia).
- 5.3. If you make an online donation, we will collect your personal information for the purpose of providing a tax receipt.

6. DIRECT MARKETING AND OTHER COMMUNICATIONS

- 6.1. LA Inc may use or disclose personal information about you for the purpose of direct marketing and you consent to your personal information being used in that way. Our communications may include:
 - a) advising you of new goods or services being offered by LA Inc;
 - b) contacting you about making further charitable donations;
 - c) information about future opportunities to assist LA Inc with its work; and
 - d) telling you about the activities of LA Inc.
- 6.2. You may choose to receive regular communications from LA Inc as well as information about future opportunities to assist LA Inc with its work.
- 6.3. You can opt out of receiving direct marketing communications from the LA Inc by contacting our Privacy Officer (please see contact details below) in writing or, if applicable, by using the unsubscribe link in an email or by accessing LA Inc's website and unsubscribing.

7. ACCESS TO PERSONAL INFORMATION

- 7.1. If LA Inc holds personal information about you, you may request access to that information by putting the request in writing and sending it to our Privacy Officer (please see contact details below). LA Inc will respond to any request within a reasonable period, and a charge may apply to cover our administrative and other reasonable costs in providing access to the personal information. We will not charge you for simply making the request and will not charge for making any corrections to your personal information.
- 7.2. There are certain circumstances in which LA Inc may refuse to grant you access to the personal information (e.g. if it would result in a breach of confidentiality). In such situations LA Inc will give you written notice that sets out:
 - a) the reasons for the refusal; and
 - b) the mechanisms available to you to make a complaint.

8. CORRECTION OF PERSONAL INFORMATION

- 8.1. If your personal details change (for example, you change your address or telephone number), please contact us so that we can update our records. If LA Inc holds personal information that is inaccurate, out-of-date, incomplete, irrelevant or misleading, you can ask us to correct the information.
- 8.2. If LA Inc holds personal information and you make a request in writing addressed to our Privacy Officer to correct the information, LA Inc will take reasonable steps to correct the information. LA Inc will respond to any request within a reasonable period.
- 8.3. There are certain circumstances in which LA Inc may refuse to correct the personal information. In such situations LA Inc will add a note to your personal information stating that you disagree with it.

9. CROSS BORDER DISCLOSURE

LA Inc does not use data hosting facilities or enter into contractual arrangements with overseas third party service providers which involve the disclosure of your personal information to overseas recipients.

10. SECURITY OF PERSONAL INFORMATION

- 10.1. LA Inc takes reasonable steps to help ensure the security of your personal information, including by taking reasonable steps to:
 - a) make sure that personal information is accurate, complete and up to date;
 - b) protect your personal information from misuse, loss, unauthorised access, modification or disclosure; and
 - c) destroy or permanently de-identify personal information if it is no longer needed for any authorised purpose (e.g. destroying credit card details of donors following a successful electronic transfer (including providing a donation receipt or tax receipt) within a reasonably practicable period).
- 10.2. LA Inc does not store donors' credit card details provided through our online portal. Instead, donors' credit card details are processed and stored as encrypted files by our electronic payment service provider. However, we may process credit card information manually if we receive such donor information via email, fax or phone. In such instances, donors' credit information will be subject to the provisions of this Privacy Policy.
- 10.3. LA Inc encourages users of our website to exercise normal safety precautions when providing personal information. LA Inc has taken reasonable steps to ensure the security of your personal information. However it cannot guarantee protection from a targeted criminal attack by individuals and/or group(s).

11. ANONYMITY, PSEUDONYMITY AND CONSEQUENCES IF LA INC CANNOT COLLECT YOUR PERSONAL INFORMATION

11.1. Where practicable, you may be given the opportunity to engage with LA Inc on an anonymous basis or using a pseudonym. This does not apply where:

- a) LA Inc is required or authorised by or under an Australian law, or a court, or tribunal order, to deal with individuals who have identified themselves; or
- b) it is impracticable for LA Inc to deal with individuals who have not identified themselves or who have used a pseudonym.

11.2. In some cases if you do not provide LA Inc with your personal information when requested (whether pseudonymously or otherwise), LA Inc may not be able to respond to your request or provide you with the support or services that you are requesting.

12. COMPLAINTS

12.1. If you have any questions about this Privacy Policy, any concerns or complaints regarding the treatment of your privacy or a possible breach of your privacy, please use the contact link on our website or contact our Privacy Officer using the contact details set out below. If you wish to make a complaint, LA Inc usually requests that you make the complaint in writing so that the details of the complaint are clear and can be investigated properly.

12.2. LA Inc will treat your requests or complaints confidentially. Our representative will investigate your request or complaint and will contact you within a reasonable time after receipt of your request or complaint to discuss your concerns and outline options regarding how they may be resolved. LA Inc will aim to ensure that your request or complaint is resolved in timely and appropriate manner.

12.3. Please contact our Privacy Officer at:

Privacy Officer

Legacy Australia Incorporated

Post: GPO Box 4020, SYDNEY, NSW, 2001

Tel: (02) 8333 0600

Email: privacy@legacy.com.au

13. CHANGES TO THIS PRIVACY POLICY

13.1. We may change this Privacy Policy from time to time.

13.2. Any updated versions of this Privacy Policy will be posted on our website. Please review it regularly.

13.3. Any changes to this Privacy Policy will take effect on the date the updated Privacy Policy is posted on our website.

13.4. This Privacy Policy was last updated **12 February 2020**.

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