

Privacy Policy

Organisation Wide

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1. Purpose

Designer Life is committed to protecting the privacy of an individual’s personal, sensitive and protected information. Designer Life is bound by the Australian Privacy Principles (Privacy Amendment (Enhancing Privacy Protection) Act 2012) that underpin the Privacy Act 1988.

2. Scope

This policy applies to all Designer Life staff (including Managers, Board of Directors and contractors), databases and files and does not cover any State, Territory or Australian Government staff, database, or file. Individuals are advised to contact the relevant government agency for a copy of their privacy policy.

This policy has been developed in accordance with Australian Privacy Principle 1 and operates across all Designer Life’s contracted employment and training services. It provides understanding of how Designer Life manages personal, sensitive and protected information including the collection, use, disclosure, and storage, as well as the individual’s right to access this information.

This policy is reviewed biennially and will also be updated any time there is a change in the Designer Life information management practices or relevant Legislation.

3. Australian Privacy Principles (APPs)

The APPs, contained in Schedule 1 of the Privacy Act, are principle-based laws that govern the way personal information (including sensitive and protected information) must be handled.

While the APPs are not prescriptive, each APP entity needs to consider how the principles apply to its own situation.

For more information on the APPs refer to the Office of the Australian Information Commissioner (OAIC) website www.oaic.gov.au/privacy/australian-privacy-principles/.

4. Definitions

Term	Definition
Privacy Act	The <i>Privacy Act 1988</i> (Cth) (as amended)
APPs	Australian Privacy Principles
Personal information	The Privacy Act defines ‘ <i>personal information</i> ’ as: “Information or an opinion about an identified individual, or an individual who is reasonably identifiable: a. whether the information or opinion is true or not; and b. whether the information or opinion is recorded in a material form or not.”

Protected information	Information about a person that was obtained by an officer under the social security law; and is held or was held in the records of the relevant government Department/s.
Sensitive information	Information or an opinion about an individual's racial or ethnic origin, political opinion, membership of a political association, religious beliefs, memberships of professional or trade associations, sexual preferences or practices, criminal record, medical/health information.

5. Policy Statement

Designer Life is committed to the transparent management of all personal, sensitive and protected information.

6. Collection of Information

Designer Life collects personal information to enable the delivery of employment and training services. Certain laws and contractual provisions relating to our services require specific information to be collected to deliver services on behalf of State and/or Federal Governments.

Designer Life will only collect personal information where the information is necessary for one or more of its functions or activities. Information may be collected (orally or in writing) from an individual, or from a representative, carer or guardian who has permission to provide us with the individual's personal information and can include information provided by third parties, including Government agencies.

Designer Life will only collect personal information in a way that is fair, lawful, and not intrusive.

6.1 Personal Information

The types of personal information or personal data we may collect about an individual include:

- Name.
- Contact details, including email address, mailing address, street address and/or telephone number.
- Demographic information, such as postcode.
- Information provided to us through customer surveys or online forms.
- Details of services we have provided to the individual and/or that the individual has enquired about, and Designer Life's response.
- Browser session and geolocation data, device and network information, statistics on page views and sessions, acquisition sources, search queries and/or browsing behaviour.

6.2 Sensitive Information

Designer Life may also collect and handle 'sensitive information' including information about an individual's racial or ethnic origin, information about criminal convictions or health and medical information. Other personal information such as Job Seeker Identification Numbers, welfare

payment eligibility and kinship details are also handled. This information is collected to identify our participants, tailor our services, overcome obstacles, maintain compliance records, and assist individuals to meet related requirements such as reporting requirements mandated by Centrelink.

6.3 Protected Information

Protected information is defined as “information about a person that was obtained by an officer under the social security law; and is held or was held in the records of the relevant government Department/s” – section 23(1) (a) of the Social Security Act 1991 (Cth).

Broadly speaking, this means that personal information about an individual who is serviced by Designer Life is also protected information if the individual receives a social security benefit or payment. Such information could include the individual’s name, date of birth and contact details.

6.4 Designer Life Website Visit Data

Various types of online data are collected, such as:

- Visitor logs and statistics.
- An individual’s device’s IP address (collected and stored in an anonymised format).
- Search terms and pages visited on our website.
- Date and time when pages were accessed.
- Downloads and time spent on web pages.
- Geographic location of visitors.
- Information provided by users through online forms on the site. If an individual completes an online form, Designer Life will collect the information requested on the form.
- Registration details entered in an enrolment form online.
- Emails and Electronic Forms.

An individual’s email address will only be recorded if they supply it to and select that as their preferred method of correspondence. The information collected by email or electronic forms will be used only for the purpose for which it has been provided, and Designer Life will not disclose it without the individual’s consent, except where authorised or required by law.

The main purpose of collecting an individual’s data is to improve their experience when using our site. Designer Life takes every possible measure to ensure an individual’s information transmitted online is secure, however we cannot guarantee the complete and total security of such information transmitted to the website.

Designer Life may use cookies on our website from time to time. Cookies are text files placed in a computer’s browser to store preferences. Cookies, by themselves, do not tell us an individual’s email address or other personally identifiable information. Cookies do allow third parties, such as Google and Facebook, to cause our advertisements to appear on their social media and online media feeds as part of our advertising campaigns. If / when an individual chooses to provide our site with personal information, this information may be linked to the data stored in the cookie.

The Designer Life website may contain links to other websites. We do not have any control over those websites and are not responsible for the protection and privacy of any personal information

which an individual provides whilst visiting those websites. Those websites are not governed by this policy.

6.5 Social Media

Designer Life uses social networking sites and applications such as Facebook, LinkedIn and Instagram to communicate widely and publicly about our services. When an individual engages with us using these services, their personal information is collected. The social networking service will also handle personal information according to their own privacy policies.

6.6 Anonymity

Where possible, Designer Life will endeavour to allow an individual to engage in aspects of our services anonymously or using a pseudonym, if requested. For example, within group training sessions or discussions.

For most of our functions and activities we usually need an individual's personal information to efficiently and effectively offer employment and training services, especially when forming part of a Government-funded program.

7. Disclosure of Information

Designer Life will only use or disclose personal information for the purpose for which it was collected.

No personal information of a Designer Life client will be shared or disclosed to a third party, for any reason whatsoever, without the express consent of the party, unless it is in circumstances related to public interest such as law enforcement or public health, where the required authorisation and checks have been undertaken.

Designer Life do not disclose information to overseas recipients.

7.1 Obtaining Consent

Designer Life will endeavour to receive an individual's consent for disclosure of personal information by way of writing. If necessary and appropriate, verified verbal consent will be accepted and a file note or database record taken.

7.2 Marketing

Where it is consented to or requested, we may occasionally use personal information to communicate with individuals via email or other means in order to provide updated information about Designer Life, details of newly available services or invitations to further training, seminars or events. This will not occur without consent.

An individual can opt out of receiving such information at any time after originally giving consent by simply replying "stop".

Designer Life does not ever disclose personal information to a third party for their own or others' marketing purposes, nor does Designer Life ever sell or trade personal information at any time, under any circumstances.

8. Privacy Breach

Should a breach in privacy potentially expose information (e.g. computer system hacked or compromised) Designer Life will immediately act to rectify the breach in accordance with organisational policy and procedures. Designer Life has a stringent response procedure for any potential privacy breach.

All Designer Life staff (including Managers, employees and contractors) must comply with the requirements of this policy.

Any breach of this policy may result in disciplinary action which may include, but is not limited to, issuing a warning, suspension, termination of employment (or, for persons other than employees, the termination or non-renewal of contractual arrangements). Breaches including accidental or avoidable breach of this policy (including failure to notify of inadvertent errors) may result in disciplinary action.

9. Storage and Security of Personal Information

Designer Life endeavours to take all reasonable steps to protect personal information against loss, interference, misuse, unauthorised access, modification, or disclosure. Designer Life uses robust storage processes and mechanisms.

Personal information stored digitally is done so with rigorous access and permissions limitations, and secure systems. Designer Life is accredited under ISO27001 Information Security Management System standards and the Federal Government's External Systems Assurance Framework ensuring robust controls to protect digitally stored personal information. Where the information is stored in hard copy, appropriate security measures are taken to avoid inappropriate access or loss.

Reasonable steps will be taken to destroy or permanently de-identify personal information no longer needed for the purpose for which the information may be used or disclosed.

10. Access and Correction

Designer Life upholds the privacy rights of individuals, and individuals may apply to access their personal information held by Designer Life. Upon a request that we are satisfied is genuine, Designer Life will take reasonable steps to respond to the request for access to personal information. Such a request will not be unreasonably refused.

Designer Life may reasonably refuse access where the Act allows us to do so, which includes (but is not limited to) where:

- Giving access would pose a threat to the life of any individual.
- Giving access would have an unreasonable impact on the privacy of other individuals.
- The request for access is frivolous or vexatious.

- Denying access is required or authorised by or under law or court/tribunal order.

Designer Life will provide reasons for a refusal of access or a denial to amend personal information.

If an individual is able to establish that the information is not accurate, complete or up-to-date, we will take reasonable steps to correct the information so that it is accurate, complete and up-to-date. To obtain access to their personal information, individuals can make a request to Designer Life Head Office at privacy@designerlife.com.au.

Before giving access to information, we will require that an individual provide proof of identification and this, along with details of the request, will be recorded on the individual's file.

11. Making a Complaint

If an individual wishes to complain to Designer Life about how we have handled their personal information, this should first be done in writing. If an individual needs help lodging a complaint, they can contact us - see 'Contact' on the Designer Life website.

If we receive a complaint from an individual about how we have handled their personal information we will determine what (if any) action we should take to resolve the complaint.

If we decide that a complaint should be investigated further, the complaint will usually be managed by a senior personnel not the person whose actions you are complaining about.

We will assess and handle complaints about the conduct of any personnel at Designer Life using our internal policies and procedures, including our *Employee Code of Conduct*.

We will advise the individual that we have received their complaint and then respond to the complaint within 30 days.

If we are unable to satisfactorily resolve a complaint, we will use an external dispute resolution service, or the individual may wish to contact the Office of the Australian Information Commissioner (OAIC).

12. Summary Of Key Points

- Designer Life accepts the general principles of confidentiality and privacy and is bound by the Australian Privacy Principles set out in the *Privacy Act 1998* (Cth).
- Designer Life will only collect personal information where the information is necessary for its functions.
- Designer Life will only use or disclose an individual's personal information for the purpose for which it was collected.
- No personal information of a Designer Life program participant will be shared or disclosed to a third party without the express consent of the participant, unless a legal exemption applies.

- An individual may apply to access their personal information held by Designer Life. You may also complain about how your information has been handled.
- Designer Life uses robust storage processes and mechanisms. Physical and electronic storage security measures exist to protect information we hold.
- All employees and other persons who are directly involved with the activities of Designer Life and may come into contact with personal information, are required to agree to confidentiality obligations in writing.

13. Revision

For any questions or queries about this policy, please contact us via the 'Contact' details on our website.

This Procedure will be revised as required and at no later than two years from the date of last major revision.

Revision	Review / Edit Date	Reason for Review	By whom reviewed
1.0	16/06/2023	Policy Requirement	Christen Hill