



ABN 88 002 198 905

## **Woolcock Institute of Medical Research Limited**

### **Privacy Policy**

Approved by the Board: 12 August 2020

## **1. Background**

Woolcock Institute of Medical Research Limited (the Woolcock) takes very seriously our obligations under the Commonwealth Privacy Act (Privacy Act) to protect your personal information. Under the Privacy Act we are bound by the Australian Privacy Principles. In this Privacy Policy we describe how we will meet our privacy obligations to you.

## **2. Personal Information**

The Privacy Act sets out the information that it protects.

Personal information generally means information or an opinion about a person, where the person is identified or is reasonably identifiable. A person can include a customer, client, patient, staff member, associate or any other person with whom the Woolcock has dealings.

Sensitive information means a person's health information, genetic information, certain biometric information and biometric templates. It also means certain personal information, being an opinion about a person's:-

- racial or ethnic origin;
- political opinions;
- membership of a political association;
- religious beliefs or affiliations;
- philosophical beliefs;
- membership of a professional or trade association;
- membership of a trade union;
- sexual orientation or practices; or
- criminal record

Where in this Privacy Policy we refer to personal information, unless the context requires otherwise, that is a reference to both personal information and sensitive information.

## **3. Personal information collected and held**

The Woolcock collects and holds only personal information that is relevant to, and reasonably necessary for, the medical research and consultations the Woolcock provides to our patients and clients. In addition, if required, we only collect sensitive information if you consent, or in specific circumstances set down in the Australian Privacy Principles.

The Woolcock generally collects personal information such as name, phone numbers, address, email address, date of birth, country of residence, and family health information pertaining to the services related to our research and services. If you provide us with personal information that we have not requested (unsolicited personal information) we will, unless otherwise required or permitted by law, delete or destroy it as soon as possible after receiving it.

#### **4. Consequences of not providing your personal information**

You are not obliged to give us your personal information. However, if you decide not to give us the personal information we request, we may not be able to provide our services to you.

#### **5. How your personal information is collected and held**

The Woolcock must collect personal information only by lawful and fair means. We will usually only collect your personal information directly from you. We may collect your personal information from another person if you consent or parents/guardians in the case of minors, if we are required or allowed by law to do so, or if it would be unreasonable or impracticable for us to have to collect it from you.

When we collect personal information about you, we will tell you why it is being collected, the organisations or the types of organisations to whom we usually disclose that kind of information, any law that requires the information to be collected, and the main consequences for you if the information (or part of the information) is not provided. We will also give you our contact details and tell you about how you can access the information.

We hold all personal information collected on our Australian office databases.

#### **6. The collection of website traffic data**

The Woolcock's website [www.woolcock.org.au](http://www.woolcock.org.au) uses Google Analytics to collect visitor data and analyse traffic on our website. This information helps us understand visitor interests and helps us improve our website. Google Analytics does not sell, give, or trade the statistics they store to any third parties for data-mining or marketing purposes. Please visit <http://www.google.com/analytics/terms/us.html> for their privacy policy.

If you visit the Woolcock's website, your web-browser automatically discloses, and our web-server automatically logs, the following information: the date and time, the IP address from which you issued the request, the type of browser and operating system you are using, the URL of any page that referred you to the page, the URL you requested, and whether your request was successful. This data may or may not be sufficient to identify you.

Any additional data that you provide, e.g. in a web-form, may also be logged. This data may or may not be sufficient to identify you.

Any additional data that your web-browser automatically provides may also be logged. This will be the case, for example, if your browser has previously been requested to store data on your computer in 'cookies' and submits them each time you request a web-page within a particular domain (such as [www.woolcock.org.au](http://www.woolcock.org.au)). This data may or may not be sufficient to identify you.

**About “cookies”:** When you visit our website, the pages that you look at, and a short text file called a cookie, are downloaded to your computer. A cookie is used to store small amounts of information. This information is collected for traffic analysis only. The cookie does not contain personal details.

Overall, cookies help us provide you with a better web-site, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. Depending on the browser that you use, you can set your preferences to block/ refuse cookies, and/ or notify you before they are placed. This may prevent you from taking full advantage of the website.

**Links to other websites:** This privacy policy does not apply to parties that may be linked or associated with the Woolcock’s website. Those website owners are responsible for the privacy of the information they collect and should be contacted directly for details of their privacy policies.

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites which are not governed by this privacy statement. You should exercise caution and look at the privacy statement applicable to the website in question.

If you disclose personal data to the Woolcock in conjunction with an identifier such as your name or your credit card details, the Woolcock will collect your information. Moreover, any data that becomes available to the Woolcock through any of the means described in the preceding paragraphs may be able to be associated with that identifier, and hence become your information.

## **7. How your personal information is used**

Personal information is collected and held so that the Woolcock can provide you with services you request or to undertake the research in which you are a participant. This is known as the "primary purpose" for collecting and holding personal information.

The Woolcock cannot use or disclose your personal information for any secondary purposes unless certain circumstances apply.

We can use or disclose personal information for a secondary purpose where you give us your consent to do so, or where:

- the secondary purpose is related to the primary purpose (where the information is sensitive information, it must be directly related to the primary purpose); and
- you would reasonably expect us to use or disclose the information for the secondary purpose.

We may also use or disclose information where such use or disclosure is permitted by the Australian Privacy Principles. Such disclosures might generally include:

- direct marketing where we have your approval to do so (to provide updates on research, community events etc.), fundraising, volunteering for research;
- government bodies, regulators, law enforcement agencies and any other parties where authorised or required by law;
- other organisations if you have given your express consent; and
- any other organisations identified at the time of collecting your personal information or to which we are legally required to disclose your personal information.

## **8. Data quality and protection**

The Woolcock will take all reasonable steps:

- to make sure all personal information we collect is accurate, complete and up-to-date at all times; and
- to make sure all personal information we use or disclose is (having regard to the purpose of the use or disclosure) accurate, complete up-to-date and relevant at all times.

We will also take all reasonable steps to protect your personal information from misuse, interference and loss, and from unauthorised access, modification and disclosure. Once your personal information is no longer required by us, we will take reasonable steps to destroy or permanently de-identify that personal information, except in circumstances where we are required by law to retain it.

Despite applying the highest standards, security breaches can occur so, despite the measures we have put in place, we cannot guarantee the security of your personal information. You must take care to protect your personal information (for example, by protecting any usernames and passwords). You should notify us as soon as possible if you become aware of any security breaches.

## **9. Access and correction**

If you think the personal information the Woolcock holds about you is not accurate, complete or up-to-date, you should inform us. Also please let us know any relevant changes to your personal circumstances as soon as possible.

We will take reasonable steps to correct information where you provide sufficient evidence or we are otherwise satisfied, having regard for the purpose for which the information is held, that the existing information is inaccurate, out-of-date, incomplete, irrelevant or misleading. We will notify the correction to other parties to whom we have previously disclosed the information. If such a party refuses to make a correction we will notify you of that refusal and how you can make a complaint.

If you wish to access the personal information we hold about you or request correction of it, you should contact the Woolcock's Privacy Officer.

Your request should specify the information to which you require access or which you wish to be corrected. We will keep a record of your request and the manner in which it was dealt with.

We will not charge you for requesting access to or correction of your personal information. However we may charge you the costs associated with meeting your request for access, for example photocopying and postage costs.

We are required to respond to your request for access or correction within a reasonable period. Our aim is to do so within 5 business days of receipt of your request.

We will provide you with access in the manner you request, if it is reasonable and practicable to do so.

If we cannot meet your request for access or correction, we will notify you by email. Where reasonable, we will give you our reason and take steps to provide you with access. We will also tell you about how you can complain about our decision.

If you are not satisfied with our handling of your request, you can contact us to discuss your concerns or complain to the Australian Privacy Commissioner via [www.oaic.gov.au](http://www.oaic.gov.au)

## **10. Anonymity**

You can contact us anonymously or by using a pseudonym. However, being unable to identify you will limit the services that the Woolcock can provide you with. There may be specific cases where we are prevented by law from dealing with you unless we identify you.

## **11. Data breach**

Should a data breach occur, the Woolcock will notify affected individuals and the Office of the Australian Information Commissioner (OAIC) of the data breaches that are likely to result in serious harm within 30 days of the breach event.

The factors which might contribute to a reasonable person thinking “serious harm” might have occurred include:

- The sensitivity of the information;
- Whether the information was encrypted;
- Whether the information was in a secure file;
- How likely it is that the security could be breached; or
- The identity of the person who obtained the information, whether they intend to cause harm to the affected person and the nature of the harm.

## **12. Complaints and further information**

If you would like further information about how we handle your personal information, please send us an email to [info@woolcock.org.au](mailto:info@woolcock.org.au)

If you wish to make a complaint in relation to privacy, including a breach of the Australian Privacy Principles, please put your concerns in writing to:-

The Privacy Officer  
Woolcock Institute of Medical Research Ltd  
431 Glebe Point Road, Glebe NSW 2037, Australia  
Telephone: 02 9114 0420

The Woolcock will investigate your complaint and respond to your concerns as quickly as possible and within 45 days.

**Policy review**

This policy will be reviewed every two years.