

PRIVACY POLICY

Purpose

This policy sets out how SANE Australia (SANE) aims to protect the privacy of your personal information, your rights in relation to your personal information, and the way SANE collects, holds, uses, and discloses your personal information.

Scope

This policy applies to all SANE's services which are only available within Australia, including the SANE Australia website, the SANE Expanded Digital Mental Health Service, SANE Forums, The Dax Centre programs and the Lived Experience and Carers Forums which are provided by SANE in partnership with other mental health organisations in Australia. This policy does not apply to any third-party websites (which are not owned or controlled by SANE) that are linked to any SANE websites.

Policy Statement

SANE protects the confidentiality of personal information collected about our service users.

In handling your personal information, SANE complies with the *Privacy Act 1988* (Cth) (Privacy Act), the Australian Privacy Principles and all other relevant legislation, including the:

- *Health Records (Privacy and Access) Act 1997* (ACT);
- *Information Privacy Act 2009* (QLD);
- *Health Records and Information Privacy Act 2002* (NSW); and
- *Health Records Act 2001* (VIC)

Personal information

Personal information is any information or an opinion that could be used to identify you.

SANE collects your personal information for the primary purpose of providing services to you, or as your potential employer. SANE takes reasonable steps to ensure your personal information is used for the purposes for which it was collected, or as otherwise permitted by the law. You are under no obligation to provide your personal information to SANE. However, without certain information from you, SANE may not be able to provide its products, programs and/or services to you.

Types of personal information

SANE collects personal information which you provide to us. This may include your name, address, age or date of birth, telephone number, email address, Aboriginal or Torres Strait Islander identification, ethnic origin, language spoken at home, gender identity, contact details of your support person, and other information required by SANE to carry out its functions and activities.

SANE may also collect some of your health information to provide services to you. When collecting your health information, SANE will obtain your consent and explain how the information will be used and disclosed. If SANE collects your health information from a third party (for example, your doctor), you will be informed that this information has been collected and how it will be used.

By disclosing your personal information or other data on SANE Websites for example by completing surveys or posting on Forums, you acknowledge that the data you submit may be used by SANE for research and evaluation purposes. Research and evaluation activities will be subject to ethics approval (through the University of Melbourne). By disclosing information or other data on SANE Websites or surveys, information shared by you in the form of feedback or service usage data may also be used by SANE for marketing, advocacy and promotional purposes – only in circumstances where it has been appropriately deidentified and aggregated.

Some SANE service users including those participating in SANE's online forums and self-directed services have the option of remaining anonymous or using a pseudonym (please see the SANE Community Guidelines for more information). Personal information will only be linked to a pseudonym or anonymous user if this is required or authorised by law, or if the individual has consented to providing or linking the personal information. Service users who wish to participate in the Guided Service are required to identify themselves.

Collecting personal information

Generally, SANE collects your personal information directly from you, through an interaction or exchange by way of in-person, telephone, email, video conference, webchat, mail or through the use of the SANE's websites and online services.

There may be occasions when SANE collects your personal information from other sources such as:

1. your carer or family
2. an entity you represent (including but not limited to your employer or a company of which you are a director)
3. an information services provider
4. a publicly maintained record or other publicly available sources of information including social media and similar websites
5. an external recruitment, labour hire, or background screening services provider or third parties with whom you have previously worked
6. referrals from staff of alternative services (including health and medical services)

Disclosing personal information

SANE discloses your personal information for the purpose for which it was collected. This may include disclosing your personal information to:

- SANE professional advisors, agents, contractors, and consultants;
- emergency services;
- health partners (for example, referrers);
- third parties engaged to perform administrative or other business management functions;
- external auditors;
- insurance providers;
- regulatory bodies if and as necessary, and
- related service providers, health care professionals and emergency services.

SANE will only disclose your personal information to third parties with your consent or if disclosure is required or authorised by law.

Marketing and Direct Marketing

SANE may also collect, hold, use and disclose personal information, including deidentified feedback on our service captured through feedback surveys in order to:

- inform you or other interested persons or entities about products, programs and services offered by SANE in media including social media, marketing and health promotional materials, public statements or advocacy publications;
- promote SANE services publicly using de-identified feedback comments and de-identified service metric and usage data;
- promote fundraising for SANE, or
- for Peer Ambassador engagement.

Individuals can opt-out of receiving direct marketing communications by contacting SANE on the contact details in this policy or through any opt-out mechanism contained in a marketing communication.

Security of personal information

SANE takes steps reasonable in the circumstances to ensure that the personal information it holds is protected from misuse, interference, and loss and from unauthorised access, modification, or disclosure.

SANE holds personal information in both hard copy and electronic forms in secure databases on secure premises, accessible only by authorised staff. SANE's cloud storage providers also maintain appropriate measures to protect personal information that SANE stores with them from unauthorised access, use and disclosure.

SANE will destroy or de-identify personal information in circumstances where it is no longer required, unless SANE is otherwise required or authorised by law to retain the information.

Accessing and correcting personal information

SANE ensures the personal information it holds is accurate, up-to-date, complete, relevant and not misleading. Under the Privacy Act, you have a right to access and seek correction of your personal information that is collected and held by SANE. If at any time you would like to access or correct your personal information, or you would like more information on SANE's approach to privacy, please contact SANE's Privacy Compliance Officer with the details set out below.

To access to your personal information, you must:

- provide proof of identity to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected, and
- be reasonably specific about the information you require

SANE will endeavour to respond to requests to access or correct personal information within 30 days.

Privacy complaints

Please direct all privacy complaints to SANE's Privacy Compliance Officer. All privacy complaints will be dealt with seriously, promptly, and confidentially; and will not affect any existing obligations or commercial arrangements between you and SANE.

If you are dissatisfied with the outcome of your complaint, you may refer the complaint to the Office of the Australian Information Commissioner.

Changes to this policy

This policy may change from time to time. Any updated versions of this policy will be posted on our website and will be effective from the date of posting.

Contact us

For further information or enquiries regarding your personal information, or if you would like to opt-out of receiving any promotional or marketing communications, please contact SANE's Privacy Compliance Officer at: privacy@sane.org

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DOCUMENT TYPE	Policy		
APPROVAL LEVEL REQUIRED	Board		
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DOCUMENT OWNER APPROVAL	Name: Kate Peck	Role: Head of Clinical Governance and Services	Date: 21/11/2022
QUALITY CONTROL	Name: Aisha Newnham	Role: Quality Manager	Date: 21/11/2022
CEO APPROVAL (where applicable)	Name: Rachel Green	Date: 21/11/2022	
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