

PRIVACY POLICY & PROCEDURE

Introduction

Kidney Health Australia (**KHA**) is a registered charity and the peak body for kidney disease in Australia. We strive to create healthier communities through increased awareness and early detection of kidney disease and connecting kidney patients to vital resources and services to help them manage their condition. We work with the clinical and research community to support treatment and research improvements and innovations so that one day, every Australian will have healthy kidneys.

We are committed to protecting the privacy of personal and sensitive information which the organisation collects, holds, and administers in accordance with the legislation. Personal information is information which directly or indirectly identifies a person.

KHA Websites/App (please see the appendix for list of our Websites and App) may contain links to third party websites. We are not responsible for the privacy policies of any third-party websites. We recommend that you review the privacy policy of each website you visit.

Purpose

The purpose of this document is to provide a framework to deal with privacy considerations.

We have adopted the following principles in relation to handling personal information.

We will endeavour to:

- collect only information which the organisation requires for its primary function.
- ensure that stakeholders are informed as to why we collect the information and how we administer the information gathered.
- use and disclose personal information only for our primary functions or a directly related purpose, or for another purpose with the person's consent.
- store personal information securely, protecting it from unauthorised access; and
- provide stakeholders with access to their own information, and the right to seek its correction.

Scope

This privacy statement applies to all business activities of The Australian Kidney Foundation trading as Kidney Health Australia (ABN 37 008 464 426) and its related and trading entities, including its Websites/App; to the extent that they affect or involve the collection, use, disclosure or handling of personal information.

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POLICY

Collection of Personal Information

- The personal information held by KHA may include, but is not limited to:
 - your name, date of birth, current and previous addresses, telephone/mobile phone number, email address, bank account or credit card details, occupation, driver's licence number, KHA ID, KHA PIN, username or password
 - KHA also holds details of your KHA services (including their status).
- Where reasonably practicable, we attempt to collect information directly from individuals. When we collect information, we will generally explain to the individual: why we are collecting it, who we give it to and how we will use or disclose it or. Alternatively, those matters will be obvious from the circumstances.
- We may collect personal information from individuals who are not customers of KHA but whose personal information is purchased or rented from a list, given to us by those individuals via our Websites (including Help Centre), Social Media Platform or in the course of a transaction.
- If we collect information about an individual from someone else, we will take reasonable steps to ensure that the individual is made aware of how we obtained their information, the other personal information that we collect in the course of a transaction, or that you provide to us when you contact us.
- We will collect personal information from you by lawful and fair means and not in an unreasonably intrusive way.
- If you choose not to provide certain personal information (e.g. your date of birth), KHA may not be able to provide you with the services you require, or the level of service on which KHA prides itself. You do have the right to deal with us anonymously or using a pseudonym, but in most circumstances it will not be practicable for us to provide any services to you except for the provision of general responses to queries.
- Occasionally, you may need to provide personal information about other individuals to KHA (e.g. about your authorised representatives). If so, KHA relies on you to inform those individuals that you are providing their personal information to KHA and to advise them that KHA can be contacted for further information (see 'How to contact us' below).

We will endeavor to:

- Only collect information that is reasonably necessary for the performance and primary function of our operations and activities.
- Notify stakeholders about why we collect the information and how it is administered.
- Notify stakeholders that this information is accessible to them.
- Collect personal information from the person themselves wherever possible.
- If collecting personal information from a third party, be able to advise the person whom the information concerns, from whom their personal information has been collected.
- Collect sensitive information only with the person's consent. (Sensitive information includes health information and information about race, gender, and others).
- Determine - where unsolicited information is received - whether any included personal information could have been collected by us in our normal manner(s), and if so, that personal information will be treated in accordance with this policy. (If the included personal information could not have been collected by us in our normal manner(s), it will be destroyed, and the individual whose personal information has been destroyed will be

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notified about the receipt and subsequent destruction by us of their personal information).

- Collect and disclose sensitive information in accordance with any legal obligations - where collection or disclosure is permitted or required by law.

How we collect personal information

KHA collects personal information in several ways, including:

- Directly from you, when you provide information by phone or in application forms, or when you submit your personal details through KHA's websites.
- From third parties such as KHA's related companies and your representatives.
- From publicly available sources of information.
- From the organisations identified below under 'When KHA discloses your personal information'.
- From KHA's own records of how you use your KHA services.
- When legally required to do so.

How we use your personal information

Your personal information may be used to:

- Verify your identity
- Assist you to subscribe to KHA services.
- Provide the services you require.
- Administer and manage those services, including charging, billing, and collecting debts.
- Inform you of ways the services provided to you could be improved.
- Research and develop KHA services.
- Gain an understanding of your information and communication needs for KHA to provide you with a better service.
- Maintain and develop KHA's business systems and infrastructure, including testing and upgrading of these systems

In relation to the personal information of job applicants, staff members, volunteers, and contractors, we may collect the personal information for purposes including:

- To enable us to carry out our recruitment functions.
- To correspond with you, provide training and professional development.
- To fulfil the terms of any contractual relationship.
- To ensure that you can perform your duties.
- For insurance purposes.

If you have any concerns about your personal information being used by us in any of these ways, please notify us.

Where we receive unsolicited job applications or requests to be engaged as a volunteer, these will usually be dealt with in accordance with the unsolicited personal information requirements under this policy.

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Direct marketing

Your personal information is also collected so that KHA can promote and market its services to you (including by way of direct mail, telemarketing, social media, SMS, and MMS messages). This is to keep you informed of our products, services, and special offers. If you do not wish to receive this information, please call 1800 454 363.

In relation to marketing and promotional material sent via email, we will not send only if you opt out or if it is provided in response to your request.

In relation to direct marketing, KHA will use your personal information for direct marketing where you have provided that information, and you are likely to expect direct marketing, then you will be sent direct marketing containing an opt-out. If we use your personal information obtained from elsewhere, we will still send you direct marketing information which will also contain an opt-out. We will always obtain your consent to use sensitive information as the basis for any of our direct marketing.

When we disclose your personal information

In order to deliver the services, you require, KHA may disclose your personal information to organisations outside of KHA and its subcontractors. Your personal information is disclosed to these organisations only in relation to KHA providing its services to you (i.e. KHA does not sell your data to any other organisations).

These organisations carry out KHA's:

- customer enquiries.
- mailing operations.
- information technology services;
- installation, maintenance, and repair services;
- marketing, telemarketing and door-knocking services;
- market research;
- web site usage analysis; and
- Clinical and Research functions.

KHA takes reasonable steps to ensure that these organisations are bound by confidentiality and privacy obligations in relation to the protection of your personal information.

In addition, KHA may disclose your personal information to:

- your authorised representatives or your legal advisers (e.g. when requested by you to do so);
- KHA's professional advisers, including its accountants, auditors and lawyers;
- government and regulatory authorities and other organisations, as required or authorised by law; and
- organisations who manage KHA's business and corporate strategies.

How do we destroy personal information that is not required?

- Personal information that is no longer required by us will be de-identified and destroyed.
- Your personal information may be kept for direct marketing purposes if you have not opted-out or you have consented in writing for us to retain your personal information for that purpose.

Help us to ensure we hold accurate information

KHA takes all reasonable precautions to ensure that the personal information it collects, uses, and discloses is

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accurate, complete, and up to date. However, the accuracy of that information depends to a large extent on the information you provide. That is why KHA recommends that you:

- let KHA know if there are any errors in your personal information.
- keep KHA up to date with changes to your personal information such as your name or address.

Data security

KHA maintains sophisticated data security systems, networks, and procedures. In particular all databases maintained by KHA are protected by secure network links, which are complemented by password protection, virus protection and internal quality procedures.

Sensitive and health related information

KHA will apply particularly stringent procedures (including the provisions of the Australian Privacy Principles) to its collection, use, disclosure and handling of any personal information, which includes sensitive information (e.g. information concerning race, religion, political affiliations) or health information (e.g. information concerning an individual's medical condition). Where practicable, KHA will maintain the anonymity of an individual in a database of personal health information unless the identity of the individual is necessary to perform a lawful activity.

You can access your personal information

You have a right to access your personal information, subject to some exceptions allowed by law. If you would like to do so, you will need to put your request in writing for security reasons, and either send it by mail to:

Privacy Officer, Kidney Health Australia, PO Box 9993, Melbourne Vic 3001

Or send an email to careteam@kidney.org.au

KHA reserves the right to charge a fee for searching for and providing access to your information.

Although no fee will be charged for accessing your personal information or making a correction, KHA may charge a fee to retrieve and copy any material.

How long will KHA keep your information?

Under our destruction and de-identification policies, your personal information that is no longer required will be de-identified or destroyed. In many circumstances, however it will be kept for alumni and marketing purposes as you will have consented to that in writing with us.

How to make a privacy complaint

If you have any concerns, complaints or you think there has been a breach of privacy, then also please contact our Privacy Officer, who will usually first deal with you over the phone. If we then have not dealt satisfactorily with your concerns we will meet with you to discuss further.

If you are not satisfied with our response to your complaint within 30 days from this meeting, then you can refer your complaint to the Office of the Australian Information Commissioner via:

- call the OAIC on 1300 363 992;
- enquiries@oaic.gov.au
- If you have a hearing or speech impairment, use the National Relay Service <http://relayservice.com.au>; or
- <https://forms.business.gov.au/aba/oaic/privacy-complaint-/>

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RESPONSIBILITIES

The CEO (Chief Executive Officer) is responsible for adopting this policy, and the CFO (Chief Financial Officer) is responsible for developing and reviewing this policy, and for the implementation of this policy, for monitoring changes in Privacy legislation, and for advising on the need to review or revise this policy as and when the need arises.

We may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to our operations and practices and to make sure it remains appropriate to the changing legal environment.

How to contact us

If you have any questions in relation to privacy, please contact Kidney Health Australia on 1800 454 363 between 9am and 5pm, Monday to Friday (excluding National Australian Public Holidays).

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Appendix

KHA Websites/App

Kidney Health Australia
bigredkidneywalk.org.au
kidneykarrally.org.au
Big Red Bus Booking*
CKD Go!
My Kidneys My Health
My Kidneys My Choice
Kidney Forum*

* This Website/App is hosted overseas

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2	10/06/2014		
3	25/07/2016	Eugenia Lambis	Re-formatting
4	21/05/2020	Moore	Review and Update
5	15/7/2020	Priya Ravichandaran	Minor updates following internal consultation