



Privacy Policy

1. Purpose

Multicultural Development Australia Ltd. (MDA) is committed to protecting the privacy and rights of people in the way we collect and manage their personal information.

This Policy outlines our approach to the ethical management of personal information in line with the *Privacy Act 1988 (Cth)* and the Australian Privacy Principles (APPs).

This Policy applies to you if you are:

- Receiving a service from us
- An employee, subcontractor or volunteer
- Seeking employment with us; or
- Interacting with us through our website, digital platforms or social media sites.

This Policy explains how we collect, hold and use your personal information and when we might share it with others.

2. What information we collect

MDA will not ask you for any personal information which we do not need. The types of information we collect will depend on your relationship with MDA, and includes:

- your name, phone number, address, email
- photographs, video and audio recordings of you
- your personal circumstances (e.g. marital status, age, gender, occupation, accommodation and relevant information about your family)
- your financial details (bank accounts, payment details)
- your identity (e.g., date of birth, passport, visa, drivers licence)
- government identifiers (e.g. Immigration, Medicare, Tax File Number, Centrelink Reference Number)
- employment (e.g. Blue Card, Police checks, work history, referees).

Sometimes, MDA collect sensitive information about you including your health, racial or ethnic origin, professional memberships or any criminal record you may have. We will only collect sensitive information about you with your consent and for a specific purpose e.g. to provide you with a specific service, resolve a complaint or assessing suitability for a job.

Depending on why you contact us, you may choose to remain anonymous or use a pseudonym, but this may result in us not being able to provide services to you, or being able to contact you to respond to your feedback.

3. How we collect information

We generally collect personal information directly from you (or through an interpreter or another nominated representative), but there are times when we collect your personal information from a third party. This is normally from a government department that funds us to provide services to you.

We collect information from you in a variety of ways including:

- paper based forms
- electronic (and online/digital) forms
- subscription applications and emails
- when you attend our events or training
- face to face
- telephone
- websites and social media channels
- online portals, and
- from government agencies.

When you provide your personal information to us, you are confirming that you agree for us to collect, use and disclose your personal information in accordance with this Policy, available on our website or upon request. You can withdraw your consent at any time.

4. How we use your personal information

The type of personal information we collect will depend on why you have contacted us. The relationship you have with us will determine how we use your information, but generally we use your information to:

- provide settlement and case management services
- report to government departments
- conduct surveys/research
- get your feedback
- respond to your enquiry, feedback or complaint
- refer you to another service provider
- let you know about our upcoming events or programs
- send you newsletters/information for services you have subscribed to.

5. Privacy and our website

If you choose to give us your details when you subscribe to our website or a mailing list, we may also send you information about related companies, *Welcome Residential* and *Welcome Sports*. You can opt out of these services at anytime.

Our website uses 'cookies' to help us improve the user experience, and to help us remember your preferences. You can refuse the use of cookies by selecting the appropriate settings on your browser.

We use Google analytics to monitor our website traffic data and to help us understand our website traffic and webpage usage. Google Analytics does not identify individual user information. You can opt out of Google Analytics if you disable or refuse the cookie or use the [opt-out service provided by Google](#).

6. Third Party Service Providers

We outsource some business activities like audits and information technology support. We have contracts in place to protect your personal information.

We also use digital applications for surveys, newsletters and event registrations, and third parties may capture and store your personal information outside of Australia. These parties include (but are not limited to) Facebook, Google, MailChimp and SurveyMonkey, and may not be subject to the Privacy Act, but they will have their own privacy policies.

When you are receiving a service under an MDA program, we will not process, store or share your personal information outside of Australia if our contracts say we can't.

7. When we will share personal information

Depending on the type of service you are receiving from us, we may receive and share your personal information with the government department that funds that service. This allows us to provide you with a service that meets your needs. We also provide reports to our funding bodies, to make sure we are providing you with a quality service.

We will need to share your personal information if we need to link you to another service that better meets your needs. We will ask your permission in this case.

There are some times when the law requires us to share your personal information without your consent. This is usually if we have received a court order or legal direction or if we believe that you or someone else is at risk of harm.

8. How we store your personal information

We take all reasonable steps to make sure your personal information is held securely and protected from loss, interference, unauthorised access or misuse. We generally store personal information in electronic databases. Some of these databases may be held on our behalf by third party data storage providers.

We use physical and technical processes to protect the confidentiality and security of information that we hold. We restrict access to information to staff who need to use the information and our databases and network servers have the appropriate security measures in place. We conduct regular access and security audits to ensure we follow our information and privacy procedures.

We only keep information for as long as we need it and destroy, return or de-identify when it is no longer required. We do this according to the terms of our funding contracts and our data retention and disposal procedures.

We also follow the Office of the Australian Information Commissioner guidelines around handling any accidental or unauthorised disclosures of personal information.

9. How to access your personal information

You can ask us to view the personal information we hold about you, and ask for changes to be made if you think it is incorrect. Just contact us on the details provided below.

10. Complaints about how we handle your information

If you are unhappy with the way we have handled your personal information, you should contact us first on the details provided below:

Website	Email	Mail	Phone
www.mdaltd.org.au/contact	privacy@mdaltd.org.au	28 Dibley Street Woolloongabba Qld 4120	07 3337 5400

If you are not happy with the response you get, you can ask for it to be reviewed.

If you are still not happy with our response, you can contact the [Office of the Australian Information Commissioner](#) directly on 1300 363 992 or enquiries@oaic.gov.au. This is where you can also get more information about the Australian Privacy Principles.

If you receive a service from us, you can also contact the Department of Social Services (DSS) or Department of Home Affairs, but your first step should be to contact MDA.

11. Related documents

Legislation/External Documents

- Privacy Act 1988 (Cth)
- Information Privacy Act 2009 (Qld)
- Australian Privacy Principles
- Australian Border Force Act 2015 (Cth)
- Privacy and confidentiality requirements set out in service and funding agreements

Internal Documents

- Procedures for access to confidential client information
- Privacy and Confidentiality Statement and Acknowledgement Form
- Code of Ethics and Conduct
- Disciplinary Procedure
- Complaints Information Sheet
- Complaints Policy
- Complaints Procedure
- Document Control and Records Management Policy
- Records Management Procedure
- Retention and Disposal of Records Procedure
- Refugee Linking Policy
- Notifiable Data Breach Response Procedure
- Notification of Data Breach Report Form

12. Policy Owner

The Chief Executive Officer and Company Secretary are responsible for the annual review and approval of this Policy.

13. Approval and Review

Date Approved
November 2009

Date Reviewed
July 2018

Next Review
July 2019

14. Definitions

Personal information	any information or an opinion about a person or a person that makes them identifiable
Sensitive information	information or an opinion (that is also personal information) about a person's: racial or ethnic origin political opinions/membership of a political association religious beliefs or affiliations philosophical beliefs membership of a profession or trade association or trade union sexual orientation criminal record health information
Disclosure	sharing personal information with another entity or individual, intentionally or not. Includes where information is shared with a contractor to perform services on our behalf.