



Privacy Policy

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Document Information

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Approvals

Approval by the individuals listed below denotes formal acceptance of this document by Expression Australia.

Name	Title	Department	Contact Details
Arturo Calderon	Chief Operating Officer	Corporate Services	arturo.calderon@expression.com.au +613 9473 1165
Heath Saunders	National Marketing Manager	Corporate Services	heath.saunders@expression.com.au

Document History

This document is to be reviewed annually and reviewed/revised when major changes occur to the organisational structure of Expression Australia, or new requirements are imposed.

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Version	Date	Revision details	Author
1.0	13/05/2019	Document Creation. Approval by SMT.	Johanna Matthews
2.0	21/10/2021	Inclusion of new National Marketing Manager	Sam Marshall
3.0	22/10/2021	Changes directed by GK and converse with GV and lawyers to advise of small cookies updates in Privacy Policy March 2021	Lisa McBain
4.0	22/09/2023	Minimal Change. Update of company address.	Lisa McBain
5.0	02/10/2023	Minimal Change.	Lisa McBain
6.0	09/10/2024	<ol style="list-style-type: none"> Alignment with 2021 NDIS Standards. Inclusion of new COO and National Marketing Manager for approval. Inclusion of how participants can access and amend personal information. 	Francis Kurth

		<ol style="list-style-type: none">4. Inclusion of how participants can complain in the event of a data breach.5. Inclusion on information retention, storage information and exclusions to consent.6. Inclusion of Consent including for Media Consent (photography/videography)	
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Introduction

The Victorian Deaf Society (A.B.N.56 004 058 084) and its related entities (we, us, or our) recognise and value the protection of your personal information. We are committed to respecting the privacy of all individuals involved with our organisation.

This Privacy Policy explains how we will handle your personal information in accordance with the Australian Privacy Principles (Privacy Act 1988 Cth) and other applicable legislation.

Sometimes another policy or privacy collection statement may apply instead of, or in addition to, this Privacy Policy. If that's the case, we will let you know and direct you to the additional policy.

By using our website at www.expression.com.au (**Website**), or otherwise engaging with use or using our products and services, you consent to us handling your personal information in accordance with this Privacy Policy.

Collection of Data and Personal Information

The nature of the personal information we collect about you will depend on the reason for your dealings with us. Generally, we collect personal information such as your name, title, contact details (address, phone, e-mail address). We may also collect other personal and sensitive information about you. For example, in some circumstances we may collect additional personal information about you:

- where you engage us to assist you with any NDIS or other personal management services, we may collect information about your health, your financial situation, living situation, your employment history, your education history and other information that is required to assist with such services;
- where you participate in or use any of our programs such as Expression Audiology, any interpreting or translation services, or Expression Learning, we may collect information about your health, your financial situation, your financial situation, living situation, your employment history, your education history and other information that is required to assist with such services;
- if you participate in surveys and other types of research, we may collect information about your health or as other information as required for the particular survey or research;
- if you are applying for a position with us, then we may collect personal information about you related to our recruitment processes (for example your qualifications, skills, work history, residency status and health information as applicable);
- if you or an entity you are associated with are providing services to us, we may collect a range of personal information for the purpose of assessing the potential engagement, carrying out induction and work, health and safety processes; and other information to comply with our obligations as permitted or as otherwise required by law.

Where you provide us with any sensitive information, we assume you consent to our collection of such information unless you tell us otherwise at the time of collection of the information. We will generally not otherwise collect sensitive information about you unless the collection is otherwise authorised or required by law.

How we collect personal information

Generally, we only collect personal information directly from you when you knowingly provide it (unless it is impractical or unreasonable to do so). This may include through online forms, paper forms, online portals, face to face, over the telephone, at events or services, for example:

- when you access services from any of our programs such as Audiology, Employment, Accommodation Services, Auslan Anywhere etc;
- when you attend events or services for Auslan Anywhere then we may collect images or recordings of you at those events;
- where we require your personal information to maintain accurate records;
- if you participate in surveys and other types of research;
- if you subscribe to our mailing lists;
- when applying for a position with us;
- during your employment with us (where applicable); and
- other situations where you would reasonably expect information to be collected.

We may in some circumstances collect personal information about you from third parties or other sources. These may include your parents or guardian, your medical or health professional, employers, teachers or other individuals acting on your behalf. We may also collect personal information from public sources, government agencies, our contractors or advisers, or if you are a prospective employee, from your referees.

If you provide us with personal information about a third party, you represent and we collect the personal information on the basis that you have that person's consent for us to collect and handle their personal information in accordance with this Privacy Policy.

If the third party is under the age of 18 years of age then you also represent and we collect the personal information on the basis that you have the consent of their parent or legal guardian to provide us with that personal information and for us to use that personal information in accordance with this Privacy Policy.

Generally, if we are unable to collect the personal information we require then we may not be able to provide you with the products and services you seek. If the information provided is incorrect or incomplete, this may also prevent, limit or otherwise affect our ability to provide our products or services to you.

Why we collect, use and disclose personal information

We collect, use and disclose your personal information for the following primary purposes (and other related purposes that you would reasonably expect):

- to enable us to provide our products and services to you;
- to enable your participation in one of our programs to ensure the proper functioning of our organisation and its services (including providing access to our services and programs); to respond to your enquiries;
- to promote our products and services (for example, we may use images and records of you at events and services organised by Auslan Anywhere to promote Auslan Anywhere and our events, services, products and other offerings);
- for our internal business purposes such as for conducting market research, auditing, marketing, planning, billing, product development and other research and compliance with our legal obligations; or
- for other purposes with your consent or as otherwise required or permitted by law.

Sharing Information with Third Parties

We may exchange your personal information within our corporate group. We may also disclose your personal information to our agents, contractors, service providers and research partners for the purposes set out above, and for the purposes of those parties providing services to us or performing business services or functions on our behalf (for example, our technology service providers, marketing service providers, mail distributors, conference and event organisers).

In addition, we may also disclose your personal information to third parties upon your request such as your parent/guardian, medical professionals, prospective employers or any other nominated individuals. Where we disclose your personal information for this purpose, we do so based on your consent or where we are otherwise permitted or required by law to do so.

We may also share your personal information without your consent where required to do so by law.

We may also, in the event of a sale, transfer or assignment of the whole or part of our business and/or assets and facilities to a third party, disclose your personal information to that third party for their use in operating the business or assets to be transferred.

Consent

See: [What is Consent?](#) for an informative PDF on consent by the NDIS.

We will always ask you for your consent before seeking information about you from another party. When asking for consent, we will make sure you understand what you are agreeing to that you are only giving consent because you want to, not because you feel like you must.

Your consent is recorded in our system along with how long you want the consent to last for and exactly what you are giving consent for. Expression Australia cannot make decisions for you, you need to give us consent first.

You can change your consent at any time, this includes changing:

- who you've given consent to
- how long your consent will last
- the types of consent you've given.

Media Consent

Expression Australia will always ask for your consent before using any photography or videography of you, now or in the future for the purpose of external communications including advertising and marketing as well as posted on Expression Australia's Social Media account(s) including Facebook, Instagram, Website and printed products. You can always withdraw consent at any time by emailing quality@expression.com.au

Marketing

We may use personal information we hold about you for marketing and promotional purposes and we may send you information about other services and programs that may be of interest to you. Our communications to you may be sent in various forms such as by post, email, or SMS. You can select your preferred method for receiving these communications or opt-out of receiving these communications altogether. To unsubscribe, use the opt-out mechanism in one of our communications or contact us via the details below.

Website and cookies

Our Website uses 'cookies', which are pieces of information that websites send to the browser and are stored in the computer hard drive. Cookies make using the Website easier by storing information about your preferences on the Website. This allows the Website to be tailored to you for any of your return visits. Cookies will not identify you personally. It is necessary to collect your IP address for your interaction with various parts of the Website. Your IP address is the identifier for your computer when you are using the internet. We store your IP address for security and audit purposes. Your IP address will not be used by us or intentionally released to any third party.

If you would prefer not to receive cookies, you can alter your security settings on your web browser to disable cookies or to warn you when cookies are being used. However, by disabling the cookie function in your web browser you may impede your ability to use parts of the Website.

Our Website may contain links to third party websites or advertisements. We are not responsible for how your personal information is collected and used or handled once you leave our Website. This Privacy Policy does not apply to any third party websites. You should review the privacy policy and terms of use for those websites each time you visit them.

Please note that security of information transmitted over the Internet cannot be completely guaranteed. We cannot guarantee the security, during transmission, of any personal information provided to us via our Website. Please bear this in mind when transmitting important information by this means to us.

Access to your personal information

In most cases, you have the right to access the personal information that we hold about you. If you wish to access your personal information, please contact our Quality Team at feedback@expression.com.au

We will endeavour to deal with all requests for access to personal information as quickly as possible (and in any event generally within 30 days). Requests for a large amount of information, or information which is not currently in use, may require further time before a response can be given.

We may charge you a reasonable fee for access if a cost is incurred by us in order to retrieve your information, but in no case will we charge you a fee for your application for access.

Whenever a fee will be applied, you will be notified of how that fee will be calculated, or where possible, the total amount that will be charged. You will then have the option to decide whether to proceed with your access request.

In some cases, we may refuse to give you access to personal information you request, where the law requires or permits us to do so.

If we refuse to give you access, we will provide you with reasons for our refusal, unless doing so would be unreasonable in the circumstances.

Correction of your personal information

The accuracy of the personal information we have requested from you is important to us. Should you suspect, or become aware of, your personal information that we hold is inaccurate, out of date, incomplete or misleading, please contact our Quality Team (via the details below). We will take reasonable steps to correct your personal information as quickly as possible unless we refuse such a request where we are permitted to do so by law.

If we refuse to change the personal information as you request, we will provide you with reasons for our refusal, unless doing so would be unreasonable in the circumstances. In the case we have corrected personal information about you that we have previously disclosed to another third party organisation, you may also request that we take reasonable steps to give notice of the correction to that third party, and we

will take any such reasonable steps to notify any third party to which we have disclosed the inaccurate, out of date, incomplete or misleading personal information.

These mechanisms for correcting your personal information operate alongside, and do not replace, other informal or legal procedures by which you may be provided correction of your personal information.

Overseas transfer of personal information

We rarely disclose personal information to recipients located overseas, however, we may do so from time to time where permitted by the privacy laws. Generally, we will seek your consent to such disclosures, other than where the overseas recipient is regulated in a way that is substantially similar to the Australian Privacy Principles (other than APP 1) or where we are otherwise permitted by law to make the disclosure.

Concerns and complaints

If you have concerns or complaints about how we handle your personal information, we encourage you to contact us. Any concern or complaint should be made in writing to our Quality Team (see “contact us” below).

Alternatively, you may contact the Office of the Australian Information Commissioner (OAIC) with your concern. Information about lodging a complaint is available on the OAIC’s website (see in particular: <http://www.oaic.gov.au/privacy/privacy-complaints>).

If you are deaf, or hard of hearing or have a speech impairment, contact the Office of the Australian Information Commissioner through the National Relay Service:

Teletypewriter (TTY) users phone 133 677 then ask for 1300 363 992.

Speak and Listen users’ phone 1300 555 727 then ask for 1300 363 992.

Privacy complaints

If you wish to make a complaint about a breach of your privacy, please contact us using the contact details at the bottom of this document.

We will respond to your complaint or request promptly and we may seek further information in order to provide a full and complete response. We are committed to a fair and impartial resolution of any complaints without reprisal.

If you are not satisfied with the response from us, you may refer the complaint to the NDIA using the following contact details:

Email: internalintegrity@ndiscommission.gov.au

Post: NDIS Commission Internal Integrity, PO Box 210, Penrith NSW 2750.

In person: by visiting a NDIS office or by raising concerns with a NDIS planner, Local Area Coordinator (LAC) or Early Childhood Partner (EC).

Online Form: [Online Feedback Form](#)

Online Chat: [Online live chat](#)

Call: 1800 800 110 (National Contact Centre).

If you are not satisfied with the response from the NDIA, you may refer the complaint to OAIC.

How to complain to the OAIC:

You can contact the OAIC if you wish to make a privacy complaint against the NDIS Commission, or if you are not satisfied with how the NDIS have handled a complaint made to them in the first instance. The OAIC website (<http://www.oaic.gov.au>) contains information on how to make a privacy complaint. If you make a complaint directly to the OAIC rather than to the NDIS Commission, the OAIC may recommend you try to resolve the complaint directly with the NDIS Commission in the first instance.

Data Storage and Retention

Expression Australia stores personal information in a variety of formats including, but not limited to:

- hard copy files
- databases
- electronic devices, including laptop computers and mobile phones
- third party storage providers such as cloud storage facilities

We take reasonable steps to protect your personal information against misuse, interference, and loss, as well as from unauthorised access, modification or disclosure. These steps include:

- storing records securely as per Australian government security guidelines
- only accessing personal information on a need-to-know basis and by authorised personnel
- monitoring system access which can only be accessed by using authenticated credentials
- regularly updating and auditing our storage and data security systems
- ensuring access to our buildings are always secure
- undertaking due diligence with respect to third party service providers who may have access to personal information to ensure (as far as practicable) compliance with the APPs
- ensure destruction, deletion or de-identification of personal information we hold that is no longer required to be retained by the Archive Act 1983 (Cth) (Archives Act) or any other applicable laws

Data Breaches

Expression Australia will take appropriate, prompt action including reporting to the Office of the Australian Information Commissioner (OAIC) if an eligible data breach occurs and personal information, we hold is subject to unauthorised modification, loss, use or disclosure. If we suspect that there has been such unauthorised access or disclosure, we will undertake an assessment to determine if it is an 'eligible data breach' within 72 hours and take all reasonable steps to contain the unauthorised access or disclosure. We will complete our assessment to determine if an eligible data breach has occurred within 30 days of becoming aware of the potential breach.

Amendments of this Privacy Policy

We regularly review and update this Privacy Policy. The most current version of our Privacy Policy is on our Website at www.expression.com.au. You should review our Privacy Policy each time you visit our Website, use our services or provide us with personal information. Should any significant amendments occur, notification will be provided by publication on the Website 14 days prior to the changes being implemented (the Notice Period) unless the circumstances of the amendments makes it unreasonable to provide such a Notice Period.

Contacting us

If you have any questions or concerns about our privacy practices, for example, about the way in which we handle your personal information, please contact our Quality Team at the details below.

Contact details for the Quality Team

By post:

To the Quality Team

Level 6, 54 Wellington Street,

Collingwood VIC 3066

Phone: +61 3 9473 1111

SMS: 0402 217 586

Email: privacy@expression.com.au

Skype: expression.australia

Fax: +61 3 9473 1122

TTY: +61 3 9473 1199

For further information about privacy in general, please refer to the Office of the Australian Information Commissioner's website: <http://www.oaic.gov.au>