

PRIVACY POLICY

1. PURPOSE

The purpose of this policy is to outline how we collect, store and use personal information in accordance with our obligations under the Privacy Act 1988 (Cth) (Privacy Act).

2. POLICY STATEMENT

- The protection of your personal information is important to us, and we are committed to transparently handling your personal information in compliance with our obligations under the Privacy Act.
- This privacy policy tells you what to expect when we collect and handle your personal information, and how to exercise your rights in relation to your personal information. When we refer to ‘personal information’ we mean information or an opinion about you from which you are, or may reasonably be, identified. For example, this may include your name, contact details, date of birth, and gender.

3. WHAT PERSONAL INFORMATION DO WE COLLECT?

We collect personal information in different ways depending on the circumstances in which you deal with us. The following table sets out some of the common kinds of information we may collect.

Source	Kinds of information we may collect
Clients	<ul style="list-style-type: none"> • Your name, gender, ethnicity, date of birth and contact details (phone number, email address and residential address) • Information about your relationship status, sexual orientation (where relevant), family composition, caregivers and support networks • Information about your health, medical conditions and disabilities • Criminal history and information about legal matters • Information about membership in schemes such as the National Disability Insurance Scheme (NDIS) • Information about your ancestry, country of birth, languages, cultural and linguistic diversity • Identification documents and information, including your driver’s license and Centrelink Reference Number
Board Directors, Staff, Volunteers, Students & Interns	<ul style="list-style-type: none"> • Your name, gender, date of birth, driver’s licence and contact details (phone number, email address and mailing address) • Information about your relationship status and sexual orientation (where relevant) • Health and disability information

Source	Kinds of information we may collect
	<ul style="list-style-type: none"> • Financial-related information including your salary, Tax File Number, bank account and superannuation details • Information about your attendance at work, including leave and health information related to leave • Information about your entitlement to work, if applicable • National police and Working with Children Check information, as updated • Performance-related information, such as information about you gathered through performance reviews, performance management and disciplinary processes • Training and development information • Information about you gathered through monitoring your use of work resources and IT systems • Your image and movements that may be captured in photographs or through CCTV
Prospective staff	<ul style="list-style-type: none"> • Your name, gender and contact details (phone number, email address and mailing address) • Information on your resume including employment history, qualifications, education history, professional certifications and professional memberships • Citizenship and right to work information • Any information provided to us through background checks such as a National Police and Working with Children Check • Health information relevant to prospective employment and fitness for work • Information that you provide during interviews or in your application • Information that is provided to us by your referees
Donors	<ul style="list-style-type: none"> • Your name and email address • Donation amount and message content that you provide with your donation
People who provide feedback or contact us with enquiries	<ul style="list-style-type: none"> • Your name and contact details such as postal address, email address and phone number • Information you provide to us in your feedback or correspondence
Personnel of businesses we deal with	<p>The type of personal information that we collect will vary depending on the type of service that we deal with you on, but will typically include:</p>

Source	Kinds of information we may collect
	<ul style="list-style-type: none"> Your name, title, role, email address, business address and phone number Information about your employer or organisation who you represent <p>Any additional personal information you provide to us, or authorise us to collect, as part of your interaction with us.</p>

In the course of providing our services, we may collect sensitive information. Sensitive information includes information about racial or ethnic origin, political opinions, religious beliefs or affiliations, philosophical beliefs, trade union membership or association, sexual orientation or practices, criminal record, health information, genetic information or biometric information. Sensitive information is only collected with your consent or as otherwise permitted by law.

4. HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

We generally collect personal information directly from you in the course of our dealings with you as a client, when you contact us, when you provide a donation or service to us, or when you are working or seeking to work with us. Personal information may be collected through our website, over the phone, by email, in person, or through social media.

In some circumstances, we also collect personal information:

- When you attend our premises as your image and movements may be captured by CCTV cameras operating within and outside our premises. As our CCTV cameras are in continuous use, you may not be able to attend our premises if you do not want your image or movements captured by our CCTV cameras.
- From your use of our website including technical information such as your IP address, browser type and version, operating system, the date and time of your visit, the pages you access, and any information you input into or download from the website, when linked to you.
- From sources of publicly available information.

5. HOW DO WE USE AND DISCLOSE YOUR PERSONAL INFORMATION?

We generally use your personal information for purposes that are reasonably necessary to provide our services, including, but not limited to:

- providing financial counselling, tenancy and disability advocacy, well-being and legal services support to you;
- assessing your eligibility for services and tailor services to your needs;
- making referrals to other services or agencies where appropriate;
- dealing with feedback, enquiries or issues;
- processing donations;
- managing our workplace;
- monitoring, evaluating, and improving our services;

- contributing to research and reporting (using de-identified or aggregated data);
- complying with our legal, contractual and regulatory obligations; and
- protecting our lawful interests and maintaining the safety and security of our staff, clients and visitors.

In the ordinary course of providing our services, we may disclose your information to:

- courts, tribunals and opposing parties in connection with legal proceedings or advocacy matters;
- landlords, property managers, tenancy bodies or other parties involved in tenancy matters;
- other support agencies, service providers or advocacy partners where a referral is made;
- government agencies and funding bodies where required for reporting, compliance or service delivery;
- organisations that assist us in providing services such as human resources, financial management, case management and information technology services;
- our professional advisors, such as our accountants, auditors, insurers and lawyers; and
- otherwise, where permitted or required by law, such as for law enforcement or regulatory purposes.

We may use and disclose images and footage captured by our CCTV cameras to:

- monitor the security of our premises;
- identify, respond to, and investigate safety and security threats to staff and visitors on or near our premises;
- protect our lawful interests; and
- liaise with law enforcement and regulatory authorities in compliance with our legal and regulatory obligations.

We do not ordinarily send or access personal information overseas. However, some of the Information Technology systems that we use may have personnel who are required to access personal information from outside Australia to provide us with support services.

6. HOW DO WE HOLD YOUR PERSONAL INFORMATION?

We hold personal information in digital and hard copy form, at our premises and with the assistance of our service providers.

We implement a number of physical, administrative, personnel and technical measures to protect and safeguard your personal information we hold from misuse, interference and loss, and unauthorised access, disclosure or modification.

Although we make every effort to protect the personal information which you provide to us, we cannot guarantee that the storage or transmission is completely secure. If you believe that there has been unauthorised access, use or disclosure of your personal information, please contact us as soon as possible using the contact details at the end of this privacy policy.

Our website may contain links to third-party websites. We are not responsible and have no control over the content or privacy practices of those third-party websites.

7. YOUR RIGHT TO ACCESS YOUR PERSONAL INFORMATION

You may request access to the personal information that we hold about you at any time by contacting us using the details at the end of this privacy policy.

We aim to respond to and action your request within 30 days following receipt of your request. To action your request, we may need to verify your identity.

We will provide you with access, unless an exception in the Privacy Act applies. If we refuse or limit access, we will explain to you why when responding to your request.

We will not charge you for making a request to access your personal information. However, if providing you with access is not straightforward, we may charge you a reasonable amount (which we will let you know about in advance) to cover the costs we incur by retrieving your information and providing it to you.

8. YOUR RIGHT TO REQUEST CORRECTION OF YOUR PERSONAL INFORMATION

We take reasonable steps to make sure that the personal information that we collect, use or disclose is accurate, complete, up-to-date and relevant.

If you consider that information we hold about you requires updating, please contact us using the details at the end of this privacy policy.

We aim to respond to your request within 30 days following receipt of your request. To action the correction, we may need to verify your identity.

We are usually able to action your request. If we refuse your request, we will provide you reasons why. You can ask us to associate a statement with the information about you that we hold indicating your disagreement with it.

9. YOU CAN CONTACT US WITH ANY QUESTIONS, COMMENTS AND COMPLAINTS

We take the privacy of your personal information seriously.

If you have any questions, comments or complaints regarding this privacy policy, our handling of your personal information, or our compliance with our privacy obligations, please contact:

Chief Executive Officer
Midland Information Debt and Legal Advocacy Service
12 Old Great Northern Highway
Midland WA 6056
Email: feedback@midlas.org.au
Phone: (08) 9250 2123

Once we have received your enquiry, we will investigate and endeavour to respond to you within a reasonable time, usually within 30 days.

If you are unhappy with our response, you can lodge a written complaint with the Office of the Australian Information Commissioner at:

Office of the Australian Information Commissioner
 GPO Box 5288
 Sydney NSW 2001
 Phone: 1300 363 992
 Website: <https://www.oaic.gov.au/contact-us>

10. TERMS AND DEFINITIONS

Term	Definition
Personal Information	<p>Any ‘information or an opinion about an identified individual, or an individual who is reasonably identifiable:</p> <ul style="list-style-type: none"> • whether the information or opinion is true or not; and • whether the information or opinion is recorded in a material form or not. <p>Common examples are an individual’s name, signature, address, telephone number, date of birth, medical records, bank account details, employment details and commentary or opinion about a person.</p>

11. REVIEW AND REVISION

We may make changes to this privacy policy from time to time to ensure that it is up to date and accurate, and to reflect any changes to the law or our services. The updated version will be published on our website.

Approval

Version	Approved by	Ratified	Next Review
01	Board	March 2026	March 2028