

# Privacy Policy

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## General

endED Ltd ABN 90 611 935 730 (**endED**) recognises the importance of protecting privacy and the rights of individuals in relation to their personal information.

Our organisation, endED, is a non-profit dedicated to supporting individuals and families affected by eating issues and eating disorders.

This Privacy Policy outlines how we collect, manage and use personal information in accordance with the *Privacy Act 1988* (Cth) (**Act**).

We apply the Australian Privacy Principles (**APP**) to the collection, holding, use and disclosure of personal information.

## Application

endED is bound to the terms of the Act and the APPs including the standards, rights and obligations for how personal information is collected, stored, used, disclosed and secured. This policy sets out the kinds of personal and sensitive information which endED collects and holds, how the information is collected and the purposes for which endED collects, holds, uses and discloses personal and sensitive information.

Further, the policy also explains how to apply to endED for access to, and correction of, your personal information, as well as how to make a complaint if you consider that endED has not complied its privacy obligations imposed under the Act. It also explains how endED will deal with such applications and complaints.

## What is Personal Information

When used in this privacy policy, the terms “*personal information*” and “*sensitive information*” have the meaning given to them in the Act.

In general terms, personal information is any information that can be used to personally identify an individual. This may include name, mailing or street address, telephone number, email address and profession or occupation. If the information we collect personally identifies an individual, or an individual is reasonably identifiable from it, the information will be considered personal information.

Sensitive information is:

- information or an opinion (that is also personal information) about an individual;
- racial or ethnic origin;
- political opinions;
- religious beliefs or affiliations;
- philosophical beliefs;
- membership of a professional or trade association;
- membership of a trade union;
- sexual orientation or practices; or

- criminal record;
- health information about an individual;
- genetic information (that is not otherwise health information);

## What personal information do we collect and hold?

We may collect the following types of personal information:

- first and last name;
- a unique identification number as allocated to you by your employer (if applicable). Where you do not have a unique identification number, we will generate a unique identification number and assign this number to you for record keeping purposes;
- email address;
- date of birth;
- financial information;
- residential/street address;
- profession;
- occupation and employment history;
- job title;
- details of activities undertaken for training and continued professional development; or any additional information relating to an individual that is, or has been, provided to us directly through our website or our mobile application; and information provided to us through our service teams, customer surveys or personally to our representatives from time to time.

## How do we collect personal information?

We collect personal information directly from users unless it is unreasonable or impracticable to do so. When collecting personal information, we may collect in ways including:

- Have contact with us in person;
- Participate in a public or closed survey, questionnaire or opinion poll;
- Register for face-to-face or digital events (such as conferences, training events or webinars);
- Interact with us online, including through our websites, email, webchats, mobile applications or social media channels (such as Facebook, Twitter, YouTube, Instagram or LinkedIn – these social media channels will also handle your personal information for their own purposes and have their own privacy policies);
- Have donated to another organisation and have consented to receiving information from likeminded organisations;
- Apply for or express an interest in a position with us (either as an employee, or as a volunteer, or as a contractor).

From time to time, we may be provided with, and we may collect, the personal information of a third party. Where the personal information of third parties is provided, the provider agrees that the provider will ensure that those persons are aware of this Privacy Policy and have consented to the provision of that personal information.

To the extent we comply with our obligations under this Privacy Policy, the provider of third party personal information must indemnify us and agree to keep us indemnified from any costs, expense, loss or liability we suffer from using the third party's private information that is provided to us.

## Collection, use and disclosure of sensitive information

- When you browse one of our websites, the types of information that may be collected as a result of your visit are:
- The fact that you have visited the website and the date and time of your visit;  
Your server or IP address (the name or number which uniquely identifies the computer through which you are connected to the internet);  
Your top level domain name;
- The pages you have accessed and the documents you have downloaded;  
The search terms you used;  
Information about your device and approximate geolocation (such as device type, operating system, and general location data derived from your IP address), which helps us understand how our website is accessed and used.
- The previous site you visited (if you have linked to this website); and  
The type of browser you use.

We will only collect sensitive information from an individual directly, as reasonably necessary, and with the individual's consent.

Subject to the other provisions of this clause 6, sensitive information will only be disclosed in accordance with the Act as follows:

- for the primary purpose for which it was collected;
- for a secondary purpose that is directly related to the primary purpose; or
- as required by law.

We will not disclose sensitive information of an individual without the individual's prior written consent or unless required by law.

We use personal information for the following purposes:

- Website and system administration, including monitoring to prevent security breaches
- Providing support: To deliver services including support and resources to individuals and families affected by eating disorders or face to face support groups.
- Communication: To respond to enquiries, provide and receive information, and maintain ongoing contact with individuals engaged with our organisation via email, in person or through SMS communications.
- Donations and Transactions: To process and acknowledge donations and manage financial transactions related to our services and programs and the holding of fundraising events.
- Research and Analysis: To conduct research, improve our services, and contribute to the understanding and prevention of eating disorders. All research and analysis is conducted in a de-identified and aggregated format to ensure privacy and participation in surveys or other information gathering actions.

- Legal and Regulatory Compliance: To comply with applicable laws, regulations, and reporting obligations.
- To send you emails about our programs, campaigns or activities if you have agreed to receive our emails (you will be provided with an opportunity in each email to decline to receive any further emails from us by unsubscribing);
- In the case of marketing automation, to improve the emails that are sent to you and to improve the personalisation, services, programs, content and resources that are offered to you;
- To enable like-minded organisations to contact you with information that may be of interest to you (if you have consented to this);
- To assess any application from you to work or volunteer with us; and
- If you lodge a complaint or query with us, to process and respond to your complaint or query.
- To conduct business processing functions including providing personal information to our related bodies corporate, contractors, service providers or other third parties;
- For the administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes of endED, its related bodies corporate, contractors or service providers;
- To update our records and keep contact details up to date.
- If you access any interactive elements of our websites, or online or mobile applications only your display name will be shown online. We recommend that you do not post information online that may identify you or anyone else such as your address, email address or phone number. If you do post personal information online, your personal information may be identified, recovered and displayed by internet search engines.

Our websites may contain links to other websites of interest, that are not endED websites and that are therefore not governed by this Privacy Policy. We are not responsible for the protection and privacy of any information you provide to another organisation on another website after using such a link to leave our websites.

When entering information on any page on our websites, there may be a ticked box that indicates that you agree to your information being used for marketing purposes, such as receiving emails about similar events or activities in the future. You can choose to indicate that you do not agree to your personal information being used in this way, by unticking the box.

If you have previously agreed to us using your personal information for marketing purposes, you may change your mind at any time. You will be provided with an opportunity in each email to decline to receive any further emails from us by unsubscribing, or you can contact us and request for your details to be removed from our database. Regardless of where in the world you reside, endED may transfer your data to Australia and process and store it there.

## Security

We take reasonable measures to protect personal information from unauthorised access, misuse, loss, or disclosure. We maintain appropriate physical, technical, and administrative safeguards to secure the information we collect. However, no method of transmission over the internet or electronic storage is entirely secure, and we cannot guarantee absolute security.

We retain personal information for as long as necessary to fulfil the purposes for which it was collected or as required by law. When personal information is no longer required, we will securely destroy or de-identify it.

## Disclosure of personal information

Personal information will only be disclosed to third parties in accordance with this Privacy Policy. We only disclose your health information for the purposes for which you gave it to us or for a directly related purpose you would reasonably expect or if you agree.

We may disclose your personal information, including health information, where disclosure is considered necessary to prevent injury to life or health, for example, if we have reason to believe that:

- You are thinking of taking your own life;
- You are thinking of seriously harming yourself;
- You have self-harmed or have been seriously hurt by someone else;
- Your physical or mental health is such that you require emergency medical treatment;
- You are thinking of harming or have already attempted to harm someone else.

Information may be provided to third parties where services relating to the purpose for which the personal information is collected are outsourced or you would reasonably expect us to disclose it to a third party for a particular purpose. For example, we may disclose your personal information to:

- Our service providers that host our website servers;
- Our service delivery partners or contractors;
- Marketing service providers;
- Professional advisors (such as accountants, auditors and lawyers); and
- The funders of particular programs.

We may also disclose your personal information if:

- You have consented to the disclosure; or
- It is required or authorised by or under an Australian law or a court/tribunal order.

We do not directly disclose personal information to recipients located overseas.

## Accessing and correcting personal information

You may request access to your personal information collected by us, and ask that we correct that personal information. You can ask for access or correction by contacting us via the Contact Us on our Website. Your enquiry will be directed to the Senior Management. We will usually respond within 30 days.

- We may require you to verify your identity before we can assist you.
- If we refuse to give you access to, or correct, your personal information, we will notify you in writing setting out the reasons.
- We may require you to provide some proof of your identity in order to handle your request.

If you are applying for correction of personal information, you should:

- specify the personal information

- explain why you consider that the personal information should be corrected, that is, why that personal information is inaccurate, out-of-date, incomplete, irrelevant or misleading
- provide any documents/information in support.

Your application will be acknowledged on receipt. You will be advised in writing of the outcome of your application. If your application is refused, we will explain our reasons for that decision.

## Notifiable Data Breaches Scheme

In the event of any unauthorised access or unauthorised disclosure or loss of your personal information that is likely to result in serious harm to you, we will investigate and notify you and the Office of the Australian Information Commissioner in accordance with the Privacy Act.

## Complaints about your privacy

endED must manage your personal information in accordance with the obligations imposed under the APPs. If you consider that endED has breached an APP you may lodge a complaint. You should use the contact details under Contact us.

In submitting your complaint, you should provide the details of the alleged breach and any information in support. We will determine what (if any) steps should be taken to resolve your complaint. We may require you to provide some proof of your identity to action your complaint. We may require you to provide some proof of your identity in order to action your complaint. endED's Privacy Contact Officer will ordinarily conduct the initial assessment of the issues raised to determine the most appropriate course of action. What will be the most appropriate course of action will turn on a range of factors, including the seriousness of the issues raised.

We conduct preliminary assessments and investigations. We will acknowledge receipt of the complaint. We will also advise you of the outcome of endED's consideration of the issues raised.

## Changes to this Privacy Policy

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