

1.0 GENERAL

1.1.1 Purpose

Cape York Institute (ABN 39 153 770 346) of 302 – 310 Sheridan Street Cairns, Queensland (**CYI, we, us, our**) is committed to protecting the confidentiality and privacy of personal information which we collect, store and administer about you, and ensuring that the persons dealing with us understand our practices in relation to the management of personal information.

This policy does not apply to personal information collected by us that is exempt under the Privacy Act.

We may modify this policy from time to time to reflect our current privacy practice. We will display a notice on our website <https://capeyorkpartnership.org.au/> for a reasonable period after any such revisions have been made. We will keep the current version of this Privacy Policy on that website.

This policy outlines the steps we take to ensure compliance with our obligations under the Privacy Act. Unless you notify us otherwise, we will assume that you have consented to the collection of all information which you provide to us for use in accordance with this Privacy Policy.

1.1.2 Scope

This Policy applies to all users and visitors (including to our websites and Pama app).

1.1.3 Definitions and abbreviations

WORD/ABBREVIATION	DEFINITION
Disclosure	Generally means the release of information to an outside body.
Australian Privacy Principles (APPs)	There are 13 APPs contained in the Privacy Act that regulate how organisations covered by the Privacy Act manage personal information. They cover the collection, use and disclosure, and secure management of personal information. They also allow individuals to access that information and have it corrected if it is wrong.
Primary Purpose	The dominant reason for information being collected.
Personal information	Is information or an opinion (including information or an opinion forming part of a database) whether true or not, and whether recorded in a material form or not, about an individual (not a corporate body) whose identity is apparent, or can reasonably be ascertained, from the information or opinion. It includes all personal information regardless of its source.
Privacy Act	The Privacy Act 1988 (Cth).
Sensitive information	Is a subset of personal information. It means information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record or health information about an individual.

Privacy Policy	Document No.:	Revision No.:
Release Date: April 2021	<i>Uncontrolled if Printed</i>	Page 1 of 5

2.0 TYPES OF INFORMATION WE COLLECT

2.1.1 General

We may collect different types of information depending on the nature of your interaction with us. We may collect information such as:

- your contact details (e.g. name, job title(s), contact and address);
- information in identification documents (e.g. passport, driver’s licence);
- your tax file number and other government-issued identification numbers such as your Australian Business Number (ABN);
- your personal details (e.g. date of birth, gender and emergency contacts etc.);
- your bank account and payment details (e.g. credit cards);
- your donation history;
- your educational qualifications, employment history, salary and referee reports;
- your visa or work permit status;
- personal information about your family (e.g. spouse and dependents) or other supports you may have in the community; and
- your interest in particular areas of our organisation and events.

If you do not give us the personal information we request, we may be unable to provide our services to you, including because it may affect our ability to meet our obligations to clients/partners and Government funding bodies.

Where possible, we will allow you to interact with us anonymously or using a pseudonym. For example, if you contact us with a general enquiry, we will not ask for your name unless we need it to adequately handle your enquiry. However, for most of our functions and activities we usually need your name and contact information.

2.1.2 Sensitive information

We may collect sensitive information from you from time to time, including when you sign up to use our services (including our website and our Pama app), which may include health information, and information about your cultural heritage (among others). In order to register for our Pama app service you must agree to us collecting your sensitive information.

3.0 HOW WE COLLECT PERSONAL INFORMATION

3.1.1 Directly from you

We may collect personal information directly from you:

- when you contact us via any method including through in person interviews, over the phone or via correspondence received including via email;
- through registration or application processes (including online or electronic registration, and including for our Pama app);
- when you complete our questionnaires, forms or surveys;
- when you subscribe to CYI publications; or
- when you use our services (including our website and our Pama app) or visit our social media sites.

3.1.2 From third parties

We generally don’t collect personal information from third parties. However, where we do so, we will determine whether we would have been entitled to collect such information from you and to the extent we would not have been entitled to do so, we will destroy or de-identify such information as soon as reasonably practicable.

3.1.3 Website and Pama app usage

We may also automatically collect information from you when you use our Pama app or visit our

Privacy Policy	Document No.:	Revision No.:
Release Date: April 2021	<i>Uncontrolled if Printed</i>	Page 2 of 5

websites, such as:

- your IP or server address;
- the date and time of your visit;
- the parts of our Pama app or website you access during your visit;
- your actions on our Pama app or website; and
- the device and browser you are using.

Please also see section 7.1.1 (Cookies) for further information below.

3.1.4 Providing personal information to us about someone else

You must only provide someone else's information to us with the authority or consent of that person to provide us with their personal information.

4.0 PURPOSE FOR USING PERSONAL INFORMATION

4.1.1 Primary Purpose

We collect, hold, use and disclose personal information for a number of purposes including:

- to provide our services, including professional services as well as technology services and solutions (including our websites and Pama app);
- to administer processes associated with service delivery (e.g., referrals);
- to meet any requirements for government funding (see section 6.1.1 (Government disclosure) below) and to produce reports for research and policy purposes;
- to monitor or evaluate the services we provide, and improve the quality of our services (including our Pama app and website);
- to respond to requests and queries;
- to maintain contact with our clients/partners and other contacts (including alumni);
- to keep you informed of our services and developments;
- to verify identity;
- for administrative purposes (e.g., processing payment transactions);
- to manage any conflict of interest or independence obligations or situations;
- to conduct surveys and research;
- for seeking feedback;
- to comply with legal obligations and to meet our regulatory obligations;
- to perform internal statistical analysis, including of our databases and website; and
- for any other business-related purposes.

4.1.2 Marketing and Research

We may use your personal information to promote and market to you, including via email or SMS, our services, including seminars, events, promotions and offers (including those of our third party partners) in connection with our Pama app. If you do not wish to receive marketing communications from us, you may unsubscribe at any time by notifying us at the contact details below or by using any unsubscribe facility we provide for that purpose.

We may also use your personal information for internal research purposes (for instance to track user spending and saving habits, location and device data and trends) and for the purpose of improving our services, websites and Pama app. Where we do so, we will use your personal information on a de-identified and aggregated basis only.

5.0 HOLDING PERSONAL INFORMATION

We hold personal information in both hard copy and electronic formats. We take appropriate security measures to protect the personal information we hold from misuse, interference or loss, and from unauthorised access, modification or disclosure. This includes physical measures (e.g. security passes to enter our offices and storage of files in lockable cabinets) and technological measures (e.g. restriction of access, firewalls, the use of encryption, passwords and digital certificates). We also have document retention processes in place.

Privacy Policy	Document No.:	Revision No.:
Release Date: April 2021	<i>Uncontrolled if Printed</i>	Page 3 of 5

6.0 DISCLOSING YOUR PERSONAL INFORMATION

6.1.1 General

We may disclose your personal information to other related entities within our corporate group for our own business purposes.

We may disclose information to third party contractors and service providers, who help us conduct our business, some of which may be located overseas. Where information is shared with these third parties, we will take all reasonable steps to ensure that third parties observe the confidential nature of such information and are prohibited from using any or all of this information beyond what is necessary to assist us.

We do not disclose personal information to third parties for the purpose of allowing them to send marketing material to you. However, we may share non personal, de-identified or aggregated information to third parties for research purposes.

We may also disclose your personal information as permitted or required by law.

6.1.2 Government disclosure

If you use our Pama app, we may need to disclose your personal information to Government bodies involved in the funding of our Pama app and services, as part of our reporting requirements to the applicable Government funding body, including the Australian Government Department of Social Services as part of their Try, Test and Learn Fund. This is necessary for the purposes of developing and continuing to provide our Pama app service to you.

7.0 PRIVACY ON OUR APP AND WEBSITES

7.1.1 Cookies

In using our Pama app or websites, your personal information may be collected through the use of cookies. Cookies are used on some of our websites and our Pama app, primarily used to enhance your online experience and to make our sites more useful and attractive to you. Cookies are small text files placed on your computer or mobile phone when you first visit our websites or use our Pama app. Most browsers now recognise when a cookie is offered and permit you to refuse or accept it. Please note that rejecting cookies may mean that some or all of the functions of our Pama app or on our website will not be available to you.

7.1.2 Website visitors

In general, providing personal information is not required when visiting our websites. However, if you wish to receive information about our services, events and updates or which to apply for a job with us, provision of certain personal information will be required.

7.1.3 Links to third party websites

Our websites may contain links to third parties' websites. Those other websites are not subject to this policy. Visitors to our websites will need to review third parties' websites to view a copy of their privacy policy. We do not endorse, approve or recommend the services or products provided on third party websites.

7.1.4 Children

We understand the importance of protecting children's privacy, especially in an online environment. We take our obligations for protection of persons under the age of 18 seriously, and extra care shall be taken during the collection, use, disclosure and disposal of their personal information. Persons under the age of 18 require the permission of a parent or guardian prior to the collection of their personal information.

Our websites are not designed for or directed at children under the age of 13. We do not knowingly collect or maintain information about anyone under the age of 13, except as part of a specific engagement to provide professional services which necessitates such personal information to be

Privacy Policy	Document No.:	Revision No.:
Release Date: April 2021	<i>Uncontrolled if Printed</i>	Page 4 of 5

collected for the purposes of ensuring compliance with auditor policies.

8.0 ACCESS TO OR CORRECTION OF INFORMATION

8.1.1 Accessing your information

You may wish to review the personal information held by us about you. Requests to access or correct your information can be made using the contact details below. You may be required to put your request in writing for security reasons. We will respond to requests for access to your information as soon as reasonably practicable. For most requests, your information will be provided free of charge, however, we may charge a reasonable fee if your request requires a substantial effort on our part.

If we refuse to provide you with access to the information, we will provide you with reasons for the refusal and inform you of any exceptions relied upon under the APPs (unless it would be unreasonable to do so).

8.1.2 Correcting your information

We take reasonable steps to ensure that your personal information is accurate, complete, and up-to-date whenever we collect or use it. If the personal information we hold about you is inaccurate, incomplete, irrelevant or out-of-date, please contact us and we will take reasonable steps to either correct this information, or if necessary, discuss alternative action with you.

9.0 Contact

If you have any questions, concerns or complaints about how we handle your personal information, please contact us using our details below.

Name: Mr Stephen Agius, General Manager Shared Services

Email: info@cyp.org.au

Telephone: 07-4046 0600

Address: Baninh Yeeum Building, 302-310 Sheridan Street, Cairns North Qld 4870

If you make a complaint, we will endeavour to resolve your respond as soon as possible. In the event that a complaint relating to your personal information cannot be resolved by us, you may contact the Office of Information commissioner QLD using their website at <https://www.oic.qld.gov.au>, by calling (07) 3234 7373 or 1800 642 753 or by emailing enquiries@oic.qld.gov.au.

Privacy Policy	Document No.:	Revision No.:
Release Date: April 2021	<i>Uncontrolled if Printed</i>	Page 5 of 5