

Suicide Prevention Pathways Privacy Policy

Suicide Prevention Pathways Inc ABN 858 298 429 50, is committed to the collection, holding, use and disclosure of your personal information in accordance with the requirements of the Privacy Act 1988 (Cth) and associated Australian Privacy Principles (together, Privacy Laws).

This Privacy Policy describes how we manage the personal information we collect, hold, use and disclose from time to time, including in connection with our website and services available at spp.org.au. It also explains how you can seek access to and correction of the personal information we hold about you, and how you can make an enquiry or complaint about our handling of your personal information.

Our website Terms and Conditions also provide further information regarding the use of our website at spp.org.au.

Your privacy is important to us. We are committed to providing the information you need to make informed choices about the ways you use our services, make donations or otherwise engage with us.

Personal information

"Personal information" means information about an identified or identifiable individual. Examples of personal information include your name, your mobile number, your email address and your photograph.

"Sensitive information" is personal information relating to an individual's ethnic or racial origin, political opinions or membership of a political association, religious or philosophical beliefs, trade union or professional association membership, criminal record, sexual orientation or practices, as well as health information, genetic and biometric information.

Personal information we collect

The types of personal information we collect will depend on the nature of your interactions with us. The types of personal information we collect from you may include:

- your contact details, including your name, email address, telephone number, and physical address;
- your personal details, including details of your age or date of birth, current and previous employment, education, living situation, dependants, marital status and preferred gender;
- your cultural background;
- payment information.



Given the nature of our organisation, we may also collect sensitive information, such as information relating to your physical and mental health, with your consent and in accordance with applicable legislation.

You may choose not to provide us with your personal information or sensitive information; however, this may impact our ability to provide you with access to our services.

How we collect your personal information

We may collect your personal information in a variety of ways, including from public sources of information, when someone provides your personal information to us on your behalf or when you provide your personal information to us directly to use, for example:

- when you speak with us over the phone, sms, via email or in person;
- when you access our Talk Suicide Support Service;
- when you make a submission on our website, or on one of our social media platforms (e.g. you make a post on Facebook);
- when you interact with us online, for example, through websites, emails or social media;
- when you sign up to our email lists or register to attend an event we are holding;
- through written forms you provide us;
- when you participate in surveys or questionnaires;
- when you have meetings with us in person;
- when you request promotional materials from us;
- when you participate in video recordings, audio recordings, online streaming events or photo shoots;
- when you make a donation;
- when you supply goods or services;
- when you apply for an employment or volunteer position with us.

Why we collect your personal information

We collect your personal information to:

- enable you to access and engage with our services;
- refer you to a medical practitioner or other relevant support services;
- understand your needs, requirements and interactions with us so that we can tailor and enhance your experience when interacting with us and obtaining our services;
- evaluate and assess the services we provide to you;
- receive information from us, including information about our programs, campaigns and other initiatives;



- create content and identify information that may assist with providing our goods and services to you;
- assist you with making a donation;
- assist you with providing services to clients in common;
- assist you with applying for employment with us or applying to volunteer with us;
- manage our relationship with you;
- comply with our record keeping requirements;
- manage complaints and disputes; and
- comply with our legal obligations and as otherwise identified in this Privacy Policy.

How we use and disclose your personal information

We use and disclose your personal information for the purposes we collected it. Please see the "Why we collect your personal information" section to understand what these purposes may be.

We may also use and disclose your personal information for a secondary purpose which depending on the personal information:

- is closely related to a purpose for which we collected it, in circumstances where you would reasonably expect such use or disclosure for that secondary purpose; or
- is directly related to the purpose for which the personal information was collected.

We may also use and disclose your personal information in other circumstances including where:

- you expressly or impliedly consented to the use or disclosure; or
- the disclosure or use is required, authorised or permitted by law.

Who personal information is disclosed to

Your personal information may be disclosed in a number of circumstances, including the following:

- SPP employees and supervisors for the purpose of supervision and quality assurance
- external service providers, so they can provide a service that specific to your needs and circumstances;
- third parties where you consent to the use or disclosure;
- De-identified reports to the State and Commonwealth Governments for the purpose of complying with our funding agreements (if applicable);
- data analytics providers to optimise your experience of our websites; and
- where required or authorised by law.



If you provide personal information on our social media pages (for example, Instagram), the privacy policy of the social media platform will apply to the personal information you have provided.

Duty of care

If your communications with us raise concerns for your safety, we may use your personal information to try to contact you to check that you and others are safe. If we believe that the circumstances require it, we may pass your contact information to authorities who can help you and others, such as emergency services.

Anonymity and pseudonymity

You have the option of interacting with us anonymously or using a pseudonym if you feel more comfortable dealing with us that way. For example, if you contact us by telephone with a general question, we will not ask for your full name unless we need it to answer your question or otherwise provide our services and engage with you further.

What happens if we can't collect your personal information

If you do not provide us with the personal information described above, some or all of the following may happen:

- We may not be able to provide the requested activities or services to you, either to the same standard or at all
- We may not be able to provide you with information about activities and services that you may want
- We may be unable to tailor the content of our websites to your preferences and your experience of our websites may not be as enjoyable or useful
- We may not be able to contact you in relation to the various activities we undertake and services we provide.

Access to your personal information

You may request access to the personal information we hold about you by contacting us. We will respond to your request for personal information within a reasonable time of receiving the request. We will provide you with access to your personal information, unless there is a law that allows or requires us not to. If we choose not to provide you with your personal information, we will provide you with reasons for any refusal in writing.

We will not charge any fee for your access request, but may charge an administrative fee for providing a copy of your personal information.

In order to protect your personal information, we may require identification from you to verify your identity, before releasing the requested information.



Correcting personal information

It is important to us that your personal information is up to date. We will take reasonable steps to make sure that your personal information is accurate, complete, and up to date. You can also request that we correct any inaccurate, out-of-date, incomplete, irrelevant, or misleading personal information. We will respond to your request within a reasonable time.

We will take reasonable steps in the circumstances with regard to the purpose for which your personal information is held to make this correction. If we choose not to correct your personal information, we will provide you with reasons for this refusal in writing and you can ask us to associate with the information a statement that you believe the information is inaccurate, out-of-date, incomplete, irrelevant or misleading. We will take such steps that are reasonable in the circumstances to associate that statement with the records containing the relevant information.

Security of personal information

We are committed to ensuring that your personal information is secure. In order to prevent unauthorised access or disclosure of your personal information and unauthorised access, modification or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure any personal information we may collect.

These procedures include:

- Recording your personal information in a secure database;
- Securely storing your personal information including secure storage facilities for paper records:
- The use of secure data centres and cloud storage providers, and where necessary encrypting your information;
- Limiting physical access to our premises and paper records;
- Restricting electronic access to the personal information we hold through information security software and firewalls;
- Conducting privacy training for our employees.

When your personal information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your personal information.

Third parties

Where reasonable and practicable to do so, we will collect your personal information only from you. However, in some circumstances, we may be provided with information by third parties such as family members or other service providers. In such cases, we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party. You can request that we destroy or de-identify the information provided to us by third parties.



Use of technology

We may use technology to deliver, measure, and improve our services, including to:

- gather information regarding visitor activity on our website, including to evaluate our website and services based on user trends;
- understand how you use our website and services;
- identify what content you are interested in; and
- provide tailored trends or recommendations.

The information we collect electronically from our website may include:

- the date and time of your visits and content you have viewed;
- how you navigate our websites and interact with our campaigns and initiatives (including fields completed in forms, applications completed, and search items entered);
- your location information, IP address and information about the device you use to visit our websites; and
- internet provider details and referring URLs (uniform resource locators).

We may use suppliers to provide this technology, including social media providers, digital advertising agencies, Google and Facebook.

Overseas Disclosure

We are unlikely to disclose personal information to overseas recipients. Overseas recipients of information may have different privacy and data protection standards. However, before disclosing any personal information to an overseas recipient, we will consider the extent to which the overseas recipient complies with the APPs or is bound by a substantially similar privacy scheme, unless the disclosure is consented to by the relevant individual or otherwise required or permitted by law.

Complaints

Please contact us if you have a question or complaint about the handling of your personal information. We can be contacted as identified in the "Contacting us" below.

We will acknowledge your complaint as soon as reasonably practical upon receipt and will advise if we need further information from you to resolve your complaint. While we aim to resolve complaints within a reasonable timeframe (usually 30 days), some complaints may take longer to resolve, and we will contact you if the complaint will take longer than anticipated to respond to.

If you are not satisfied with the resolution of your complaint, you can contact the Office of the Australian Information Commissioner as follows:



Office of Australian Information Commissioner GPO Box 5288 SYDNEY NSW 2001 Phone: 1300 363 992 Fax: +61 2 6123 5145 Email: <u>enquiries@oaic.gov.au</u> website: <u>www.oaic.gov.au</u>

Contacting us

If you have any enquiries about this Privacy Policy, we can be contacted: by post at:

Suicide Prevention Pathways Inc. PO BOX 136 Holland Park West, QLD 4121

by email at: admin@spp.org.au

Changes to the Privacy Policy

We may change this Privacy Policy. We will post any changes to this Privacy Policy on our website, and we encourage you to check our website to view our current Privacy Policy, or to contact us to obtain a copy of our Privacy Policy.

This Privacy Policy is effective as of 30 March 2025.

POLICY DETAILS	
Title:	Privacy Policy
Owner:	Suicide Prevention Pathways
Approved By:	CEO
Approved Date:	19 th March 2025
Review Date	19 th March 2026