

## Privacy Policy

breakthru (ABN:18 097 919 607) and its related bodies or entities (we, our, us) respects your right to privacy and is committed to safeguarding the privacy of our customers, carers, and website visitors. We adhere to the Australian Privacy Principles contained in the *Privacy Act 1988* (Cth) and relevant state legislation. This policy sets out how we collect and treat your personal information.

'Personal Information' in general terms means any information that can be used to personally identify someone. It includes information or an opinion, whether true or not and whether recorded in a material form or not, about an individual who is identified or reasonably identifiable. Personal information does not include anonymous, aggregated or de-identified information.

'Sensitive Information' is a subset of personal information and is given a higher level of protection. Sensitive information is defined in the Privacy Act and includes information or opinion about an individual's racial or ethnic origin; political opinion, 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 criminal records.

'Health Information' is generally afforded the highest level of protection. Health information include information or opinions about a person's physical or mental health; disability (at any time); health preference (including future provision of health services); use of health services; bodily donations (eg blood, organs, etc) and genetics.

### **Collection of Personal Information**

breakthru will, from time to time, receive and store personal information you enter onto our website, provided to us directly or given to us in other forms.

The type of information we collect will depend on the nature of your interaction with breakthru, however breakthru may collect the following types of information:

- identification and contact details, such as name, mailing and/or street address, email address, telephone number, age or birth date;
- family type, country of birth, year of arrival in Australia, language spoken at home;
- financial information, such as housing, occupation, financial status and income;
- sensitive information, such as racial or ethnic background, criminal history and health information, English proficiency, need for an interpreter, or disability;
- other personal or sensitive information not covered above which is collected as a result of providing a customer with a product or service;
- details of the services a customer has requested or enquired about, or services provided, together with any additional information necessary to respond or deliver those services;
- any additional information relating to a customer that a customer provides in-person, by telephone, in writing or via email;
- information you provide to us through customer surveys or visits by representatives from time to time.

We may also collect some information that is not personal information because it does not identify you or anyone else. For example, we may collect anonymous answers to surveys or aggregated information about how users use our website.

### **How we collect your personal information**

breakthru collects personal information from you in a variety of ways, including when you interact with us electronically or in person, when you access our website and when we provide products or services to you. We may also receive personal information from third parties. If we do, we will protect it as set out in this Privacy Policy.

### **Notification of collection of personal information**

When breakthru collects personal information, or as soon as possible after collection, we will provide customers with a privacy notice (otherwise known as a collection notice) and/or refer customers to this Privacy Policy.

### **What happens if breakthru can't collect personal information**

Due to the nature of the products and services provided by breakthru, generally, it is not possible to provide services or deal with customers in an anonymous way. For example, if a customer does not provide breakthru with personal information described above breakthru may not be able to provide services to you, or to provide you with information about services.

### **For what purpose does breakthru collect, hold, use and disclose personal information**

breakthru collects, holds, uses and discloses personal information for the following purposes:

- to assess whether a person is eligible for services;
- to provide a range of products and services to customers;
- to contact you by a variety of measures – telephone, email, SMS or mail;
- to answer enquiries and provide information about breakthru products and services;
- to recruit staff, contractors and volunteers;
- to update our records and keep customer contact information up to date;
- for planning, quality control and for the creation of anonymous case studies;
- to update records;
- for use in monitoring and assessing breakthru services, including as part of peer review of service and reporting to funding providers;
- to provide updated personal information to our related contractors or service providers;
- to process and respond to any complaints, compliments or suggestions for improvement;
- to comply with any law, rule, regulation, lawful and binding determination;
- to assess the performance of our website and to improve operations of the website;
- for the administrative, marketing (including direct marketing), planning, produce or service development, quality control, and research purposes of breakthru, its related bodies, contractors or service providers.

breakthru may also collect, hold, use and disclose personal information for other purposes explained at the time of collection or which are required or authorised by or under law for which the customer has provided their consent.

Customer's personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

### **Disclosure of your personal information**

We may disclose your personal information to:

- any of our employees, officers, insurers, professional advisors, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this Policy. Personal information is only supplied to a third party when it is required for the delivery of our services.
- any organisation or person with the customer's expressed permission/authority.

We may from time to time need to discuss personal information to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, in the course of a legal proceeding or in response to a law enforcement agency request.

We may also use your personal information to protect the copyright, trademarks, legal rights property or safety of breakthru ([www.breakthru.org.au](http://www.breakthru.org.au)), its customers or third parties.

Information we collect may from time to time be stored, processed in or transferred between parties located in countries outside of Australia. These include, but are not limited to the USA.

If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law our user databases, together with any personal information and non-personal information contained in those databases. This information may be disclosed to a potential purchaser under an agreement to maintain confidentiality. We would seek to only disclose information in good faith and where required by any of the above circumstances.

By providing us with personal information, you consent to the terms of this Privacy Policy and the types of disclosures covered by this Policy. Where we disclose your personal information to third

parties, we will request that the third party follow this Policy regarding handling your personal information.

### **Direct Marketing Materials**

breakthru may send customers direct marketing communications and information about our products and services that we consider may be of interest to our customers. These communications may be sent in various forms, including mail, SMS, email or telephone, in accordance with applicable marketing laws, such as the Spam Act 2003 (Cth). Our customer's preference of method of communication will be used whenever practical to do so. In addition, our customers, at any time may opt-out of receiving marketing communication from us by contacting our Privacy Officer or by using opt-out facilities provided in the marketing communication.

breakthru may provide customer personal information to other organisations contracted to provide direct marketing on behalf of breakthru. We will take all reasonable steps to ensure our contractors are compliant with our Privacy Policy before providing such data.

### **Security of your personal information**

breakthru is committed to ensuring that the information you provide us is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

The transmission and exchange of information is carried out at your own risk. We cannot guarantee the security of any information you transmit to us, or receive from us. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that personal information that we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

### **Access to your personal information**

You may request details of personal information that we hold about you in accordance with the provisions of the *Privacy Act 1988* (Cth). A small administrative fee may be payable for the provision of information. If you would like a copy of the information which we hold about you or believe that any information we hold on you is inaccurate, out of date, incomplete, irrelevant or misleading, please email our Privacy Officer at [privacy@breakthru.org.au](mailto:privacy@breakthru.org.au).

There may be instances where breakthru cannot grant access to the personal information held. For example, breakthru may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If this happens, breakthru will provide written notice outlining the reasons for the decision and available complaint mechanisms.

### **Website**

*When you visit our website:*

When you visit our website ([www.breakthru.org.au](http://www.breakthru.org.au)) we may collect certain information such as browser type, operating system, website visited immediately before coming to our site, etc. This information is used in an aggregated manner to analyse how people use our site, such that we can improve our services.

### **Cookies**

We may from time to time use cookies on our website. Cookies are very small files which a website uses to identify you when you come back to the site and to store details about your use of the site. Cookies are not malicious programs that access or damage your computer. Most web browsers automatically accept cookies but you can choose to reject cookies by changing your browser settings. However, this may prevent you from taking full advantage of our website.

Our website may from time to time use cookies to analyse website traffic and help us provide better website visitor experience. In addition, cookies may be used to serve relevant ads to website visitors through third party services such as Google AdWords. These ads may appear on this website or other websites you visit.

### *Third Party Sites*

Our site may from time to time have links to other websites not owned or controlled by us. These links are meant for your convenience only. Links to third party websites do not constitute sponsorship or endorsement or approval of these websites. Please be aware that breakthru is not responsible for the privacy practices of other such websites. We encourage our users to be aware, when they leave our website, to read the privacy statements of each and every website that collects personal information.

### **Changes to Privacy Policy**

Please be aware that we may change this Privacy Policy in the future. We may modify this Policy at any time, in our sole discretion and all modification will be effective immediately upon our posting of the modifications on our website. Please check back from time to time to review our Privacy Policy.

### **Complaints about privacy**

If you have any complaints or would like to provide feedback about our privacy practices, please feel free to send in details of your complaints to:

Privacy Officer  
Suite 10.01, Level 10, 52 Alfred Street  
Milsons Point NSW 2061  
E: [privacy@breakthru.org.au](mailto:privacy@breakthru.org.au)

We take complaints seriously and will respond to you very quickly after receiving written notice of your complaint or feedback.

This Privacy Policy was last updated 26 October 2022.