

Title:	PRIVACY POLICY	REF NO: BHCC PRIV 01
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Organisation:	Bridges Health & Community Care Ltd	Distribution: All Facilities
Approved by:	Sharon Sarah Chief Executive Officer	Responsible for Review: Privacy Officer

VERSION CONTROL

Original Date	Version Number	Description of Changes Made	Who By	Date	Next Planned Revision Date
01/2021	1.0	New Policy	QRC Manager	01/2021	01/2025
	1.0	Minor amendments. Changed annual review date, revised references	QRC Manager	11/2023	11/2024
	1.0	Annual review. No changes effected	QRC Manager	12/2024	12/2026
	2.0	Revised definition of personal information. Updated references to reflect provisions of IPOLA Act 2023. The IPOLA Act amends the Information Privacy Act 2009 (IP Act), Right to Information Act 2009 (RTI Act) with commencement from 1 July 2025. The Right to Information Regulation 2009 has been replaced by the Right to Information Regulation 2025. Application of The Queensland Privacy Principles (QPPs) which replaced the Information Privacy Principles (IPPs) and the National Privacy Principles (NPPs).	QRC Manager	09/2025	09/2027
Information Classification:		☒ Public ☐ Private ☐ Protected			

1.00 Purpose

The purpose of Bridges Privacy Policy is to outline Bridges Health & Community Care's personal information handling practices.

2.00 Scope

This policy/procedure applies to Bridges Health & Community Care Ltd.

3.00 Definitions

Term	Definition
Personal Information	Personal information includes a broad range of information, or an opinion, that could identify an individual. What is personal information will vary, depending on whether a person can be identified or is reasonably identifiable in the circumstances.
Sensitive/Health Information	Sensitive information, including health information, is information or an opinion about an individual such as racial or ethnic origin, political opinions or memberships, religious beliefs, criminal record, health information or sexual orientation.

4.00 Policy

Bridges Health & Community Care Ltd ACN 632 275 275 (**we, us, our, Bridges Health & Community Care**) is committed to ensuring that your personal information is protected. This Privacy Policy sets out Bridges Health & Community Care's personal information handling practices and how we may collect, use, disclose and protect your personal information for all of our operations and activities including our Mind-Life initiative.

Our website Terms and Conditions also provide information regarding the use of our website at <https://www.bridgeshcc.org.au> and <https://www.mind-life.org.au>. We may ask that you agree to the

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website Terms and Conditions and this Privacy Policy when using our services, making a donation, or purchase goods.

What we collect

We may collect your personal information to facilitate the provision of goods and services to you. The types of personal information we collect from you may include:

- your full name;
- your job title;
- your employer;
- your phone number;
- your postal address and street address;
- your email address;
- your date of birth and preferred gender;
- demographic information such as your preferences and interests.

In some cases, we may also collect your health information or sensitive information with your consent and in accordance with applicable legislation.

You may choose not to provide use with your personal information, health information or sensitive information, however we may not be able to provide you with access to our goods and services or collect your donation as a result.

How we collect your personal information

We may collect your personal information in a variety of ways including:

- when you provide it directly to use, for example;
 - when you use us to provide with you with a service;
 - when you request, we provide you with a referral to a medical practitioner;
 - when you make a submission on our website, or one of our social media webpages (e.g. you make a post on our Facebook webpage);
 - 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 telephone conversations or messaging technology;
 - through written forms you provide us;
 - when you have meetings with us in person;
 - when you request promotional materials from us;
 - when you participate in surveys or questionnaires;
 - 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 employment or volunteer position with us;
 - when you agree to the use of cookies;
 - through embedded videos on our website;
- when someone else provides it on your behalf; and
- from public sources of information.

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Our collection of your personal information may be a one-off, ad hoc or recurring basis using any of the above sources and we may combine or link the personal information we collect with the personal information we already know about you.

What we do with the information we gather

We collect, use and disclose your personal information to:

- comply with our Government funding agreements;
- enable you to access and obtain our goods and services;
- facilitate your attendance at an event, course or clinic run by us;
- refer you to a medical practitioner;
- enable third parties or suppliers to facilitate the provision of the requested goods and services to you;
- evaluate and assess the goods and services we provide to you;
- understand your needs, requirements and interactions with us so that we can tailor and enhance your experiencing interacting with us, and obtaining our goods and services;
- 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 goods or services;
- 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;
- comply with our legal obligations and as otherwise identified in this Privacy Policy.

Use of technology

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

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

The information we collect electronically from our websites 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, search items entered);
- your location information, IP address and information about the device you use to visit our websites or our applications; 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.

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If you have registered an account with us, we may combine information from your account, with the data we collect, including via technologies. This information may be used to personalise our websites, applications, and provision of goods and services, including suggestions based on your prior use.

Website provider

Your data may also be available to our website provider to enable us and them to deliver their service to us, carry out analysis and research on demographics, interests and behaviour of our users and supporters to help us gain a better understanding of them to enable us to improve our services. This may include connecting data we receive from you on the website to data available from other sources. Your personally identifiable data will only be used where it is necessary for the analysis required, and where your interests for privacy are not deemed to outweigh their legitimate interests in developing new services for us. In the case of this activity the following will apply:

- Your data will be made available to our website provider.
- the data that may be available to them includes any of the data we collect as described in this Privacy Policy.
- Our website provider will not transfer your data to any other third party, or transfer your data outside of Australia, the European Economic Area and the United Kingdom of Great Britain and Northern Ireland.
- Our website provider will store your data for a maximum of 7 years.
- This processing does not affect your rights as detailed in this Privacy Policy.

How we use cookies

The technology Bridges Health & Community Care use to collect information may include "cookies" which identify the website pages which are being used. Cookies help us to analyse data about web page traffic and to improve our websites in order to tailor it to the customer needs. We only use the information collected from cookies for statistical analysis purposes.

Cookies help us to provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you do not accept the cookies used on our websites, this may prevent you from taking full advantage of our websites.

Links to other websites:

Our websites and other electronic communications with you may contain hyperlinks to third party content you may be interested in, to enable you to visit other websites of interest easily.

We have no control over the privacy practices of these third parties or the content on their websites and therefore have no responsibility for the protection and privacy of any information which you provide whilst visiting such websites or the content which you may view on these websites.

You should exercise caution when visiting third party websites and check the privacy policy of each relevant third party to determine their privacy practices.

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Use or disclosure of personal information

We may use or disclose your personal information for the purposes it has been collected (as identified above in "What we do with the information we gather" and "Use of Technology") or for a secondary purpose which, depending on the personal information:

- is related to the purpose for the personal information is being collected, and in circumstances where you would reasonably expect us to use or disclose your personal information for this related purpose; or
- is directly related to the purpose for which the personal information was collected.

We may also use or disclose your personal information in circumstances where:

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

Who we may disclose your personal information to

In order to provide our goods and services, and obtain donations from you, we may disclose your personal information to, for example:

- external partners, including our website developer, to conduct evaluation, research and reporting activities and statistical analysis, and any other qualitative and quantitative evaluations using the information we provide;
- reports to the State and Commonwealth Governments for the purpose of complying with our funding agreements;
- data analytics providers to optimise your experience of our websites and applications;
- marketing service providers, including but not limited to Mailchimp, to provide tailored emails to you;
- online survey providers, including but not limited to SurveyMonkey, to facilitate the provision of surveys to you;
- entities that process payments and transfer donated funds, for example, Paypal and Stripe; and
- entities that host and operate any online store we may have, such as Shopify.

If you provide your personal information on our social media pages (for example, Facebook) 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 raises 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 on your contact information to authorities who can help you and others such as emergency services and crisis service providers.

Overseas disclosure

We may disclose your personal information to, and collect your personal information from, overseas third parties. We may disclose or collect personal information from overseas third parties with your consent, where authorised by law, or where our business activity or function has been outsourced to an overseas service provider. As a result your personal information may be stored or accessed in countries which include the United States of America, those countries which are members of the European Economic Area and the United Kingdom of Great Britain and Northern Ireland.

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Marketing

We may use and disclose your personal information to advise you of the range of goods and services we provide, any new goods or services being offered, special offers, the campaigns and initiatives we are running, the status of these campaigns and initiatives and any other information which we think you may be interested in. You may opt out of receiving marketing material from us at any time, including by contacting us (see "Contacting us" below) or by using the unsubscribe function in our marketing emails.

Accessing personal information

You may request access to your personal information by providing Bridges Health & Community Care by contacting us using the contact details identified below (see "Contacting us").

We will respond to your request for personal information within a reasonable time of receiving the request. We may be unable to provide you with access to some or all of your personal information pursuant to law. Where we are unable to provide you with this information, or unable to provide the information in the manner requested, we will provide you with a written notice identifying our reasons for refusing access.

There is no fee for submitting a request to access your personal information. We may charge a fee for payment of our reasonable administrative costs in providing the requested personal information to you.

Updating personal information

We take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, up-to-date, complete and relevant for the purpose for which you have provided it. If you believe the personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading, you may request that we update your personal information by contacting us using the contact details identified below (see "Contacting us").

We will take reasonable steps to update your personal information upon request. If we refuse to correct your personal information, we will provide reasons for this refusal in writing and you may request that we associate with information a statement that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading. We will take reasonable steps to associate that statement with all our records containing relevant information.

Security

Bridges Health & Community Care is committed to ensuring that your information 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 any personal information we may collect. These procedures include recording your personal information in our own database, securely storing your personal information including secure storage facilities for paper records, 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

Anonymity and pseudonymity

Where possible, we will provide you with the option to use a pseudonym or not identify yourself, unless we are required or authorised by law to identify you. We may not be able to assist you with your specific requests if you are using a pseudonym or are anonymous.

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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, 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 5218
SYDNEY NSW 2001
Phone: 1300 363 992
Email: enquiries@oaic.gov.au
Website: <https://www.oaic.gov.au/>

Contacting us:

We can be contacted at:

- by post at:

Bridges Health & Community Care
PO Box 4
BUNDABERG QLD 4670

- by email at:

privacy@bridgeshcc.org.au

5.00 Related Documents/Forms

BHCC Policy and Procedure Manual – Quality Management
BHCC Policy and Procedure Manual – Information Security Management System
BHCC IMT 01 Information Security Policy
BHCC IMT 03 Data Breach Response Plan
BHCC IMT 06 Supplier Security Policy
BHCC IMT 08 Information Classification and Handling Policy and Procedure

6.00 References

Privacy Act 1988 (Cth)
Privacy and Other Legislation Amendment Act 2024
The Information Privacy and Other Legislation Amendment Act 2023 (IPOLA Act)
Right to Information Regulation 2025.
Freedom of Information Act 1982 (Cth)
The Queensland Privacy Principles (QPPs)
Office of the Australian Information Commissioner (<https://www.oaic.gov.au/privacy/australian-privacy-principles>)

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Office of the Information Commissioner Queensland <https://www.oic.qld.gov.au/about/privacy/the-privacy-principles>