

Privacy Policy

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Drafted by	Moore's Legal	Approved by Council of AAL	17 th February 2019
Responsible person	Chief Commissioner	Scheduled review	30 th December 2019

The Australian Air League Inc. (**the League**) respects the privacy of its members and understands the importance placed on the protection of personal information in our care. Our commitment to protecting member's privacy is important to us. Members can have full confidence that, when dealing with the League, their personal information will not be used in any way that they did not intend it to be used, and that the data will be held securely.

The League supports and endorses the Australian Privacy Principles (**APPs**) contained in the *Privacy Act 1988* (Cth) (**Privacy Act**) and will only collect, use, disclose, and store personal information in accordance with the APPs. A summary of the APPs can be found at <https://www.oaic.gov.au/agencies-and-organisations/guides/app-quick-reference-tool#app-8-crossborder-disclosure-of-personal-information>.

The League is also subject to applicable state-based legislation with regard to the handling of health information.

This policy outlines how the League handles your personal information in accordance with the privacy legislation. The League requires all members and Adult Supporters to comply with this policy at all times, and facilitate the League's compliance with its obligations under the applicable legislation.

Definitions

"Personal information" means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- (a) whether the information or opinion is true or not; and
- (b) whether the information or opinion is recorded in a material form or not.

"Sensitive information" is a type of personal information. Sensitive information includes information or an opinion about an individual's racial or ethnic origin, political opinions, religious beliefs or affiliations, sexual orientation or practices, criminal record, and health information.

"Member" means any person who holds or has held a Certificate of Membership issued by the League. This includes:

- (a) Uniformed members under 18 years of age (**"Cadet Members"**); and
- (b) Members 18 years of age and over (**"Adult Members"**) including:
 - (i) Uniformed Adult Members; and
 - (ii) Non Uniformed Adult Members (**"Associate"**).

"Adult Supporter" means an adult who, from time to time, assists the League in some way (but who is not a Member).

What type of personal information do we collect?

The type of information that the League collects and holds will depend on the nature of your involvement with us. All information collected is directly applicable to the functions and activities of the League and to the health, well-being and protection of its members.

Depending on the reason for collecting the personal information, the personal information that we collect may include (but is not limited to) name, age, residential address, the name of your school, your occupation (if relevant), suburb, postcode, date of birth, phone number/s, health information, Medicare number, email address, bank account details, next of kin details and images.

We may also collect sensitive information from a person including a working with children check, police check, medications and known medical conditions.

Whilst you are not required to provide the personal information and/or sensitive information requested by the League, if you choose not to provide information as requested, it may not be practicable for us to service your needs and to accept your application, or continue, your membership. For instance, it will not be possible for us to register you as a member, if you want to remain anonymous or use a pseudonym.

We don't usually receive unsolicited personal information but in circumstances where we do receive unsolicited personal information we will destroy or de-identify the information as soon as practicable if it is lawful and reasonable to do so unless the unsolicited personal information is reasonably necessary for, or directly related to, our functions or activities.

How do we collect personal information?

We collect personal information from you at the time when you make an enquiry or complete one of our hard copy forms.

Information is collected in a number of ways including from when you fill in a form, make an enquiry online, attend a face-to-face activity or meeting, provide email correspondence, engage with us on social media, or phone us.

Generally, we only collect personal information about you from you unless it is not reasonable or practical for us to do so, or you consent that the information may be collected from someone else. For example, Group HQ may collect information about you from the local Squadron which you have applied to be a member of the League. The League may collect personal information from individuals such as current members, prospective members, Adult Supporters, parents and/or guardians of members or prospective members, and visitors.

We will generally obtain consent from the owner of personal information to collect their personal information. Consent will usually be provided in writing however sometimes it may be provided orally or may be implied through a person's conduct.

In relation to the collection and disclosure of sensitive information, we are bound by the APPs, which provide for the circumstances in which disclosure is permitted, or required by law.

Identification number

When you apply to become a member of the League you are assigned a computer-generated number to uniquely identifies you for the purposes of the League's operations. This number has no relationship to any identifier assigned by any other agency. Personal information held by the League references this number.

How will we use your personal information?

The League may collect, hold, use or disclose your personal information for the following general purposes:

- (a) to identify you;
- (b) for the purpose for which the personal information was originally collected;
- (c) for a purpose for which you have consented;
- (d) for any other purpose authorised or required by an Australian law; and
- (e) for any other purpose authorised or required by a court or tribunal.

Our primary purpose for collecting the personal information of members and visitors is to maintain the Register of Members, record member achievements, facilitate communication amongst members, and keep members informed regarding the League's activities.

If you have chosen to provide us with your email address, we may use that address to advise you of matters of League interest as well as for direct engagement, planning, new services or research purposes.

We also collect personal information from members (as appropriate) for child safety purposes.

Disclosure of personal information overseas

The League may disclose personal information to a recipient overseas (for example where the League has outsourced a business activity to an overseas provider) in accordance with the Privacy Act. In such circumstances, the League will take reasonable steps to ensure that the overseas recipient does not breach the APPs in relation to the information.

Otherwise, the League may disclose personal information to a recipient overseas in accordance with the Privacy Act where:

- (a) the person has consented to the disclosure;
- (b) the League reasonably believes that the overseas recipient is subject to a law or binding scheme that protects the information in a way that is substantially similar to the way the information is protected under the Privacy Act; or
- (c) the disclosure is required or authorised by an Australian law or a court order.

Direct Engagement

From time to time, and in support of the League's future development and growth, the League may send direct engagement material if you have consented to receiving such information.

If you do not want to receive any such information, and it is received via email, press the "unsubscribe" button otherwise you can contact our Privacy Officer using the details below.

Once we receive a request to "opt out" from receiving direct engagement information, we will cease sending such information within a reasonable period of time.

How do we store personal information?

The League takes all reasonable steps to protect personal information under its control from misuse, interference and loss and from unauthorised access, modification or disclosure.

We protect personal information in a number of ways including securely storing paper records, using professional software systems, and password restricted access. We have physical, electronic and procedural safeguards to protect your information, which is held by us.

AAL Group HQ's use secure methods to destroy or de-identify any personal information such as computer reports and completed forms as soon as the information is no longer needed for any purpose. All other Units are expected to ensure that forms no longer required are destroyed using permanent destruction methods. Current policy is that electronic information on the membership database on past members is not removed or archived.

How you can update your personal information?

We are committed to holding accurate and up-to-date personal information.

If you would like the League to update the personal information that it holds about you, you can complete a 'Change of Personal Particulars' form (Form 18), which once completed would be forwarded to the relevant Group HQ, to advise us of amendments.

From time to time, for the purposes of data correction, the League may provide members or their Squadron with a computer printout of some or all personal data that we hold on a member.

How a person can access personal information?

If you wish to access personal information held about you or your child in order to seek correction of such information you may do so by contacting our Privacy Officer using the details below.

In accordance with the Privacy Act, the League may refuse access to personal information in a number of circumstances including where giving access to the information would pose a serious threat to the life, health or safety of a person, giving access would have an unreasonable impact on the privacy of a person, the information relates to existing or anticipated legal proceedings and would not be available under the discovery process, or denying access is required or authorised by an Australian law or court order.

We will seek to handle all requests for access to personal information as quickly as possible.

Photographs

Photos of members may be taken during events and used in public promotion. Members who do not wish for their photo to be used in this way need to advise the League's Privacy Officer in writing.

Complaints

If you would like to lodge a complaint you must contact, in writing, our Privacy Officer using the details below. We will investigate any complaint and will notify the complainant, in writing, of any decision in relation to the complaint as soon as practicable.

If you are not satisfied with the response you can refer the complaint to the Office of the Australian Information Commissioner.

For any further information about this policy please contact the Federal Operations Commissioner at privacy.officer@airleague.com.au or

Federal Operations Commissioner
Australian Air League Inc.
PO Box 245
RINGWOOD VIC 3034

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