



PRIVACY POLICY

1. PREAMBLE

LifeLine International Incorporated (ABN 12 639 930 206) (**LifeLine International**) is committed to protecting your Personal Information. This Privacy Policy (**Policy**) describes how we handle your Personal Information. It also sets out the rights you have to manage and access your Personal Information and what you can do if you are concerned with how we handle your Personal Information.

LifeLine International leads an international network of organisations (**LifeLine International Members**). The list of LifeLine International Members can be found at [Our Network | LifeLine International \(lifeline-intl.com\)](https://www.lifeline-intl.com).

The LifeLine International Members are separate legal entities to LifeLine International. This privacy policy applies to the activities (discussed in more detail below) undertaken by LifeLine International. This privacy policy does not apply to LifeLine International Members involved in the delivery of LifeLine services. LifeLine International Member organisations have their own privacy policies.

We may revise this Policy from time to time by publishing a revised version on our website. That revised version takes effect from the time it is published.

2. BACKGROUND

This policy outlines how LifeLine International will comply with its privacy obligations under Australian law. The *Privacy Act 1988* (Cth) (**Privacy Act**) is the primary Australian law which governs the handling of Personal Information about individuals.

The Privacy Act includes thirteen Australian Privacy Principles (**APPs**). The APPs detail the standards, rights and obligations for the collection, use and disclosure of Personal Information when you engage with LifeLine International.

3. DEFINITIONS

Personal Information is defined in the Privacy Act as any information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable. In general terms, Personal Information is any information or opinion that can personally identify or be used to personally identify an individual.

Sensitive Information is a subset of Personal Information that is generally given a higher level of privacy protection. It includes information or an opinion about an individual's racial or ethnic origin, political opinion, religious beliefs, philosophical beliefs, sexual orientation or criminal record, financial details, and genetic information or health information (being any personal information about an individual's health or disability).

4. COMMITMENTS UNDER THIS POLICY

4.1. Collection of Personal Information

LifeLine International collects Personal Information about you where it is reasonably necessary for us to perform one or more of our functions or activities. The type of Personal Information we collect about you depends on the nature of our relationship with you, and what you choose, or your agent chooses, to share with us.

4.1.1. Types of Personal Information collected

The types of Personal Information we may collect and hold about you includes:

- personal identifiers such as name, occupation, job title, date of birth and gender;
- contact details such as mailing or street address, email address, phone and mobile phone number;
- Internet Protocol (IP) addresses, internet clickstream and cookies data;
- government-issued identification numbers such as tax file numbers (TFN), Australian Business Numbers (ABN) or Australian Company Numbers (ACN);
- financial, credit and payment information such as credit card and bank account details;
- details of superannuation and insurance arrangements; and
- with respect to employees and contractors, personal information shared with us related to your employment or contract. This may include your emergency contact details, information necessary to pay your salary or wages, health related information and medical certificates. See section 4.1.4 for further details on information collected via job applications with LifeLine International.

Under certain circumstances, we may collect some types of Sensitive Information about you.

If we collect your Sensitive Information, we will only do this with your consent or where we are required or authorised to do so under law. We will take appropriate measures to protect the security of this information.

We may also collect information that is not Personal Information because it does not identify or reasonably identify you or anyone else.

4.1.2. How Personal Information is collected

Direct collection

We collect your Personal Information directly from you when you:

- interact with us over the phone through verbal and written (SMS) communication;
- interact with us in person;
- interact with us online via forms, our website, email communication or messaging and social media platforms;
- participate in our surveys or questionnaires;

- attend a LifeLine event, such as fundraisers;
- subscribe to our mailing list; or
- apply for a position with us as an employee, contractor or volunteer.

From time to time, we may also conduct awareness campaigns and suicide prevention advocacy initiatives that may involve the collection of your Personal Information. Where this occurs, we will take reasonable steps to notify you, or ensure you are aware, of such collection and inform you of certain matters relating to the collection, including facts and circumstances of collection, the purpose of collection, and the other types of entities to which LifeLine International usually discloses personal information of the kind collected.

Indirect collection

We may collect your Personal Information indirectly through third parties where you would reasonably expect us to do so. For example, we may obtain your Personal Information from LifeLine International Members for the purpose of conducting a case study if you have consented to this activity.

We may also use publicly available sources to obtain your information, including commercially available personal, identity, geographic and demographic information.

Unsolicited information

From time to time, LifeLine International may receive Personal Information that is additional to information that we have solicited or information that we have not taken active steps to collect. This is known as 'unsolicited personal information' and can include:

- misdirected correspondence received by us;
- information about another individual shared with us in the course of providing our services;
- employment, internship, work experience or volunteering applications sent to us on an individual's own initiative and not in response to an advertised vacancy;
- promotional material containing Personal Information sent to us by an individual promoting the individual's business or services; or
- court documents for proceedings to which we are a party or may have an interest.

If we receive unsolicited personal information and we decide that we are not permitted to collect it in accordance with the APPs, we will take reasonable steps to destroy or de-identify the information as soon as practicable, unless it is unlawful or unreasonable to do so.

4.1.3. Anonymity and pseudonymity

Where possible, we will allow you to interact with us anonymously or by using a pseudonym. LifeLine International will only do this if it is lawful, possible and practical to do so.

Where you choose to deal with us anonymously, to use a pseudonym or not to provide your Personal Information, we may not be able to effectively engage with you. Most of our functions and activities require your Personal Information and enough information about yourself to enable us to engage with you fairly, effectively and efficiently.

4.1.4. Job Applicants

We will collect Personal Information included in applications for employment or volunteering, such as your contact details, career history, education details, eligibility to work in the country where the role is based, written references and other career-related information. This may also include Sensitive Information, such as medical information or criminal history.

Personal Information may also be obtained from the following third parties:

- Personal Information through a recruitment service provider;
- prior employment history from previous employers or nominated referees;
- criminal record history, by way of a criminal history check;
- eligibility to work in the country where the role is based, by way of a passport or visa status check; and
- educational qualifications, by way of requesting confirmation of qualifications or results from an academic institution.

If Personal Information is obtained from third parties during the recruitment process, we will take reasonable and practicable steps, at or before the time of collection (or as soon as practicable after collection) to notify an individual, or to otherwise ensure awareness of the collection of Personal Information.

Personal Information may be collected during the recruitment process for the purpose of assessing and progressing an application, inviting applicants to apply for future positions of interest at LifeLine International and conducting statistical reporting and analysis in relation to the recruitment processes. Your Personal Information for future job opportunities may be held for a period of time, unless specifically requested to be deleted.

4.2. Use of Personal Information

We may use, hold or disclose your information for the following reasons, in connection with our functions or activities:

- processing donations;
- communicating with supporters, donors and partner organisations;
- recruiting and managing staff, contractors or volunteers;
- conducting marketing activities;
- providing you with newsletters or promotional materials and other information that may be of interest to you regarding LifeLine International's campaigns;
- monitoring and evaluating our campaigns and advocacy initiatives;
- conducting research and evaluation;
- developing, operating and improving our service and organisational processes;
- promoting suicide prevention and related services;
- processing and responding to any complaint or general enquiry made by you;

- for employment-related purposes, including to consider job applications, respond to job enquiries, undertake identity verification and recruitment background checks, undertake internal audits, enable employees to log into internal systems, and communicate with external suppliers and distributors;
- for administrative purposes, including to process payment transactions and prepare invoices;
- collecting feedback, including about our products, services, website or organisational processes;
- managing our affairs, consultants, contractors and the employment of our staff; and
- enabling other activities and functions of LifeLine International.

LifeLine International may use your Personal Information for the purposes of direct marketing, for example in relation to campaigns and suicide prevention advocacy initiatives. Further information on our direct marketing communications can be found in section 4.11 below.

LifeLine International will only use Personal Information for a purpose other than for which it was collected or a related purpose if you have consented to such different use or where LifeLine International may otherwise be reasonably expected to do so.

4.3. Disclosure of Personal Information

Personal Information will be used and disclosed for the purposes described in the Use of Personal Information section (refer to section 4.2) above.

LifeLine International may disclose your Personal Information to third parties in accordance with this Policy where you would reasonably expect us to do this.

For example, LifeLine International uses a range of suppliers, service providers, contractors, and partners to whom your Personal Information may be disclosed to enable the activities and functions of LifeLine International. Such third parties include:

- other LifeLine International Members that assist LifeLine International with providing our services and undertaking our functions, such as Lifeline Australia through its provision of certain services to us, such as ICT services and functionalities;
- information technology service providers;
- banks and credit card companies;
- recruitment agencies;
- professional advisers and insurers;
- government or regulatory bodies (where we are required by law to disclose Personal Information); and
- other parties where you have provided valid consent or instructed us to disclose your information.

This means that organisations and individuals other than LifeLine International may access and use Personal Information held by LifeLine International. To the extent we share your information with third parties, we put measures in place to ensure your information is kept confidential, used securely and only used for the purposes outlined above. LifeLine

International requires these third parties to enter into an agreement to comply with our security and data management guidelines, this Privacy Policy, and all relevant privacy laws in Australia.

LifeLine International generally does not disclose Personal Information in circumstances other than as outlined above. However, we may disclose personal information with your consent, or if it is required or authorised by law (including in emergency situations relating to the life, health, or safety of any individual or to assist law enforcement), or if we have reason to believe that unlawful activity or misconduct of a serious nature is being engaged in and we should disclose your information in relation to the matter.

4.4. Disclosure of Personal Information Outside Australia

We are an international organisation that shares information between our global partners and Member organisations. The list of LifeLine International Members is provided in section 1 above. This means that it is possible your Personal Information, may be shared with partner organisations based outside Australia.

We may also engage external contractors who are based overseas to provide services to LifeLine International who are bound by privacy legislation and laws where they are located. It is our standard practice to require these external contractors by written agreement with LifeLine International to comply with our Privacy Policy, which is consistent with Australian privacy laws.

For example, website analytics and other information is disclosed to our website provider when you visit the LifeLine International website. The provider stores information across multiple countries. Further, when you communicate with us through a social network service such as Facebook, Twitter or LinkedIn, the social network provider and its partners may collect and hold your personal information overseas.

4.5. Storage and Security of Personal Information

LifeLine International takes the security of Personal Information seriously and all reasonable steps are taken to ensure the security of Personal Information to protect it against loss, unauthorised access, use, modification or disclosure, and against other misuse. Our security measures include:

- storing hard copy information in a secure physical environment with access restrictions and securing paper files in locked cabinets;
- restricting access to Personal Information on 'need to know' basis i.e. only personnel who need that information to effectively provide services will gain access;
- (where relevant) undertaking background checks on personnel who require access to our IT systems and records;
- reviewing information kept on file and ensuring it is accurate, up to date and complete to the extent reasonably possible;
- having technological measures in place to ensure security;
- using secure work environments; and
- periodically reviewing and improving security measures.

LifeLine International will, at times, engage with third party providers to store or host Personal Information on our behalf, including other LifeLine member organisations. To the extent this occurs, LifeLine International takes reasonable measures to ensure these third-party providers, through entering into agreements with them, comply with LifeLine International's security guidelines and this Privacy Policy.

Currently, LifeLine International has entered into a shared service agreement with Lifeline Australia where Lifeline Australia hosts our electronic data, information, and ICT platforms as a shared service.

LifeLine International also requires our employees, contractors and third-party service providers to respect and protect the confidentiality of Personal Information held in accordance with Australian laws.

4.6. Retention of Personal Information

LifeLine International will only keep Personal Information for as long as it is needed for any purpose for which it was collected.

In most cases, this means we only retain your Personal Information for the duration of your relationship with us unless we are required to retain the information under Australian law or by order of an Australian court, tribunal or other government agency.

Personal Information collected for research and evaluation activities will be retained according to the periods specified in the project proposal and relevant law. In general, the minimum retention period is five years post-publication.

Where possible, all Personal Information which is no longer needed for the original purpose for which it was obtained or required by law to be retained will be properly de-identified or destroyed in a secure manner.

4.7. Access and Correction of Personal Information

LifeLine International takes all reasonable steps to ensure that Personal Information collected, held, used, disclosed, stored and handled is complete, accurate, relevant and up-to-date.

4.7.1. Access to Personal Information

You may request access to your Personal Information by contacting the LifeLine International Secretariat at secretariat@lifeline-international.com. We will provide this access to you once we have verified your identity. Please allow at least 14 days for processing of a request.

If we cannot give you access to your information, we will contact you to explain why.

4.7.2. Correction of your Personal Information

If you believe the Personal Information we hold about you is incorrect, incomplete or inaccurate, then you can ask us to amend it. To correct the personal information we hold about you, please contact the LifeLine International Secretariat at secretariat@lifeline-international.com.

Requests will be responded to within a reasonable period of time after verifying your identity unless it is unreasonable or impracticable to do so. Please allow at least 14 days for processing of a request. All reasonable steps to comply with a request will be made, unless it is inappropriate to make the changes you request or there is a need to keep information for legal, auditing or internal risk management reasons. In that case, we will contact you to explain why.

Where an update to your personal information is made, you may request LifeLine International to take reasonable steps to distribute the corrected information to other recipients who had access to the initial data.

4.8. Cookies

When an individual visits or uses LifeLine International's website, Personal Information and user data may be collected automatically through cookies, including but not limited to: IP address and/or domain name; operating system (type of browser and platform); and the date, time and length of the visit to the website. Cookies are pieces of information that a website transfers to your computer's hard disk for record keeping purposes and are a necessary part of facilitating online transactions. Cookies improve your experience and our website(s).

We do not use cookies to identify you. Cookies are primarily used for the compilation of statistical information about the use of LifeLine International's website. Cookies may also be used to assist LifeLine International and our third party service providers present personalised content and/or targeted and customised advertising to an individual on our website and/or on third party websites.

If you do not wish to receive any cookies, you may set your internet browser settings to refuse cookies. However, if you remove or block cookies on your computer, this may affect our website's functionality and you may not be able to take full advantage of the services on LifeLine International's website.

4.9. Website Analytics

LifeLine International's website uses website analytics to help us better understand visitor traffic so we can improve our services. These tools help LifeLine International understand how visitors engage with its website. LifeLine International can view a variety of reports about how visitors interact with our website so that we can improve it.

This information is collected anonymously, reporting website trends without identifying individual visitors. We use this information to track the effectiveness of the website. Types of data collected include visits, viewed pages and the technical capabilities of our visitors. Although this data is mostly anonymous and will not identify an individual, it is possible that we may connect it to you in some circumstances.

4.10. Direct marketing

We may send you direct marketing communications and information about our services, opportunities, or events that we consider may be of interest to you if you have requested or consented to receive such communications.

These communications may be sent in various forms, including mail, SMS or email, in accordance with applicable marketing laws, such as the *Australian Spam Act 2003* (Cth).

You consent to us sending you those direct marketing communications by any of those methods. If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. You may opt-out of receiving marketing communications from us at any time by contacting the LifeLine International Secretariat at secretariat@lifeline-intl.org.au. Please allow at least 14 days for us to process your request.

4.11. Social Networking Services

LifeLine International uses social networking services such as Facebook, Twitter and LinkedIn to communicate with the public about our services. When you communicate with us using these social networking services, we may collect your Personal Information but we only use it to help us to communicate with you. The social networking service will also handle your Personal Information for its own purposes. These services have their own privacy policies and may handle your information overseas (refer to section 4.4 above). You can access the privacy policies for these companies on their websites.

4.12. Links to Other Websites

LifeLine International's website may contain links to third party websites, and third party websites may also have links to LifeLine International's website. This Privacy Policy does not apply to external links or other websites.

These third party websites may collect your Personal Information, and your data and Personal Information is governed by that party's own privacy policy and security terms. Before disclosing your Personal Information on any other website, LifeLine International encourages individuals to read the privacy policies of any such website you link to from LifeLine International's website.

We make no representations or warranties in relation to the privacy practices of any third party provider, including social networking service providers, or any third party website, and we are not responsible for the privacy policies or the content of any third party provider or website. LifeLine International is not responsible for any practices on linked websites that might breach your privacy.

4.13. Privacy Data Breach Obligations

Please contact LifeLine International if you become aware of or suspect any breach of security relating to Personal Information. If reasonable grounds establish there has been a data breach relating to Personal Information, we will comply with our obligations and responsibilities under relevant privacy laws (including the notifiable data breaches regime in Australia), including any obligation to notify you of the data breach and take effective remedial action to protect your Personal Information.

4.14. How to make a complaint or contact us

If you wish to contact us about a privacy matter or are concerned about the way we have handled your personal information, you can lodge a written request or complaint with LifeLine International at: secretariat@lifeline-international.org.au

In the case of lodging a complaint, you will be asked to provide proof of your identity and full details of your request in writing before we can process your complaint. Please allow up to 30 (thirty) days for LifeLine International to respond to your complaint.

To the extent we are unable to satisfactorily resolve your complaint, you have the right to contact the Office of Australian Information Commissioner (at www.oaic.gov.au/) to lodge a complaint.

5. POLICY CHANGES

LifeLine International operates in a dynamic environment. Over time, aspects of our operations may change as we respond to changes in our operating environment.

LifeLine International reserves the right to change this Privacy Policy at any time and notify you by posting an updated version of the Privacy Policy on its website. If at any point we decide to use Personal Information in a manner materially different from that stated at the time it was collected, we will notify individuals by email or via a prominent notice on our website, and where necessary we will seek the prior consent of individuals.

This Policy was last updated on: 28 July 2022