

## ADF POLICY ON PRIVACY

Document Number	35	
Document Owner	ADF Privacy Officer	
Policy Review	ADF CEO	April 2015
	ADF Audit, Risk and Compliance Committee	April 2015
Policy Authorisation	ADF Board	April 2014
Date policy is effective	October 2012	
Review frequency, Date of next review	Annual	April 2016

### 1. Purpose

Australian Dairy Farmers Limited (ADF) recognises the importance of the Australian Privacy Principles ("APP's") and the protection of the privacy of all personal information of individuals which it collects, holds and uses in the course of its activities. Personal information is information or an opinion about an identified individual or about an individual who is reasonably identifiable. The APP's prescribed in the Privacy Act 1988 as amended ("the Act") apply to ADF and all other organisations, and this policy is intended to implement the APP's and ADF's obligations under the APP's.

This policy outlines the guidelines which must be observed by ADF staff when collecting, storing and using Personal Information.

### 2. About Us

Australian Dairy Farmers (ADF) is the national voice for dairy farmers across Australia. Our mission is to provide strong leadership and nationally coordinated policy and advocacy. Our goal is to grow internationally competitive, innovative and sustainable dairy farm businesses.

### 3. Scope

ADF holds Personal Information about Members, some stakeholders and ADF staff.

For the purposes of this policy the definition of Personal Information is any information about an individual that would make their identity apparent.

ADF has developed a set of principles that guide our collection, storage, usage and disclosure of this information.

### 4. Why Do ADF Collect Personal Information

ADF only collects personal information necessary for the operation of the organisation. The personal information we collect includes the following:

In relation to ADF members:

- name;
- date of birth (optional);
- address;
- telephone numbers;

- email and fax addresses;
- information with respect to the member's *state* membership;
- information specific to the member's dairy farm;
- information on the member's partner, if applicable

In some cases we may in addition collect video or photographic images of members for use in ADF publications.

In the normal course of the operation of the organisation, ADF also collects from service providers and applicants for employment such personal information as is necessary for the day to day operations of the organisation.

#### **5. How Personal Information is Collected and Held**

ADF collects personal information in written form, online or verbally. With respect to members, personal information is primarily collected from the member's application for membership and will not be collected from any source other than the member.

Personal information is held either in electronic or written form, but primarily in a secure data base, access as to which is limited to authorised and appropriately trained staff. ADF contracts our data storage and compilation of mailouts, but we take steps to protect this information including ensuring that third parties are subject to privacy obligations. ADF have internal policies and procedures in place to prevent unauthorised access, modification, disclosure or misuse of personal information.

#### **6. Purposes of Collection of Personal Information**

ADF's purposes for collecting and holding personal information are:

- to enable applications for membership to be made and assessed, and for applicants to become members;
- to enable ADF to offer services to members;
- to enable ADF to keep members informed by various means about issues affecting industry sectors, policy initiatives, industrial awards and upcoming events;
- to organise ADF functions, events, meetings and generally to manage the membership so as to fulfil our functions; and
- to enable ADF to comply with our constitutional obligations, such as notices of meetings, election of officers and voting processes, and renewal of memberships;

ADF does not give personal information to third parties for the purpose of direct marketing, however ADF may use personal information for the purpose of offering products and services to members. Members may elect to opt out of receiving such communications by notifying the Privacy Officer and ADF must action the members request within a reasonable period.

From time to time ADF may disclose personal information to:

- State Dairy Farmer Organisations
- Associated or subsidiary organisations which ADF administers

#### **7. Anonymity & Pseudonymity**

Under the APP's, individuals have the option of dealing with an organisation anonymously or by use of a pseudonym unless it is impractical for the organisation to deal with the individual on this basis. While an individual may deal with ADF anonymously or by use of a pseudonym for the purpose of telephone or general enquiries, ADF are a membership based organisation and it is impractical for ADF to otherwise deal with individuals who do not identify themselves or who use a pseudonym.

**8. Data Quality**

ADF staff will take reasonable steps to ensure Personal Information that is collected is accurate, complete and up-to-date.

**9. Government Identification**

ADF will not adopt, use or disclose a government related identifier of an individual, unless this is required or authorised under an Australian law or by an order of a court or tribunal.

**10. Security**

ADF staff will take reasonable steps to protect Personal Information from misuse, loss or unauthorised access, modification or disclosure. Personal Information will be disposed of securely when it is no longer of use to ADF.

**11. Guidelines/Usage**

Reasonable steps will be taken to inform people how their Personal Information is handled and make the information available on request.

**12. Access**

As an individual for whom we hold personal information you may request access to the personal information. ADF will endeavour to respond to the request within 30 days, but in any event will respond within a reasonable period from when the request is received. ADF will provide you with access to the personal information unless one of the several reasons for refusal set out in the APP's applies. These reasons include such matters as that access would be unlawful or would unreasonably impact on the privacy of other individuals.

A request for access should be made by notifying ADF's Privacy Officer (details below). You may at any time update your membership details by contacting the Privacy Officer.

**13. ADF Website**

The ADF website does not use cookies. The website does make a record of the user's visits and logs anonymous information, such as the IP address and geographical location of the user's computer as well as the times and dates the site was visited and the pages visitors accessed and files downloaded.

The main purpose for collecting this information is to provide statistical information used for website maintenance and system administration.

ADF staff must not disclose information collected for statistical purposes outside of ADF staff or those under contract to maintain the website. ADF will not attempt to identify individuals from these records unless it is necessary to the investigation of a breach of law.

**14. Member opt out**

ADF provides individual Members with a choice as to whether we send them information in the future. Members may also change this choice by contacting us with this request and ADF will record the Member's preference. ADF must maintain accurate records of a member preference to enable this to occur.

**15. Complaints**

You should contact the Privacy Officer if you, as an individual for whom ADF holds personal information, wish to make a complaint that ADF has breached the APP's in some way, for example in relation to how personal information is collected, how it is stored, or how it is used or disclosed. All complaints will be logged on a database/complaints register and it is our aim to resolve any such complaint in a timely manner.

Your initial complaint may be verbal or in writing but you may be required to provide additional information (which may be written information) so that the complaint can be properly investigated. If the complaint cannot be resolved by discussion at the level of initial contact, it will be referred to the Board for consideration. You will be informed of the decision of the Board and the reasons for the decision. If you remain dissatisfied you may refer your complaint to the Office of the Australian Information Commissioner.

## **16. Responsibilities for Managing Privacy**

Specific responsibilities for privacy are assigned to individuals in certain positions as outlined below. These positions must ensure that ADF staff are suitably instructed either through training or the communication of policies and procedures, as to their obligations to the protection of Personal Information in their handling.

### ➤ **ADF Privacy Officer**

- ADF has designated the ADF Operations Manager as the ADF Privacy Officer. This role will be point of contact in ADF to whom staff, Members and members of the public can direct any queries or complaints in the first instance.

### ➤ **ADF Operations Manager**

- The ADF Operations Manager will need to recognise that consideration of privacy issues will affect web content in a number of ways:
  - Personal Information of staff and directors presented to the public or Members
  - Personal Information of members of the public included in web documents;
  - Obtaining Personal Information from the public through their visit to the website.

### ➤ **ADF CEO**

- It is the responsibility of the CEO to implement procedures to ensure that these principles are observed in the collection, use, storage, or disclosure of Personal Information. Personal Information also applies to information relating to ADF staff. The CEO is responsible for:
  - Ensuring staff training in privacy requirements;
  - Protecting staff privacy in the workplace.

### ➤ **ADF Staff**

- ADF Staff must observe these privacy principles when dealing with Personal Information in the gathering and handling of staff information, gathering and handling of membership information, conducting research, or undertaking consultation or advocacy work.

## **17. Breach of Policy**

As is the case with all of ADF policies, if staff do not comply with this Policy they may face disciplinary action under ADF Performance Disciplinary Management Procedure. This disciplinary action may involve a verbal or written warning or, in serious cases, termination of your employment or engagement with ADF. ADF may recover from the staff member any costs incurred as a result of a breach of this ADF Policy.

## **18. Availability of this Policy**

This policy is available on our website, [www.australiandairyfarmers.com.au](http://www.australiandairyfarmers.com.au)  
A hard copy can be obtained by contacting the Privacy Officer.