

Spirit Hive Privacy Policy APP | Australia

Last Updated: 11th January 2019

The electronic version of this policy is the approved and current version. Any printed version is uncontrolled and may not be current.

*Protecting your privacy and confidentiality is fundamental to the way we care for people.
For the purpose of this Privacy Policy, 'Spirit Hive' (and 'we', 'our', 'us') means:*

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1. Your privacy is important to us

Spirit Hive is committed to upholding the Australian Privacy Principles contained in the Privacy Act 1988 (Cth). We recognise the importance of privacy and community awareness regarding the collection, use, disclosure and security of personal and sensitive information which we may collect during the course of our many functions. This Privacy Policy sets out how we manage your personal and sensitive information and protect your privacy.

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2. What information we collect and hold

Spirit Hive performs many functions and provides a wide-range of services and programs across Australia. We will only collect personal and sensitive information that is necessary for us to carry out these functions and provide these services and programs. The type of information we may collect, hold and use, varies depending on the purpose for which it is collected (as set out at paragraph 4 below) but may include (amongst others):

Supporters: as a supporter of Spirit Hive's mission and activities, we may need to collect your name and contact details. As a valued financial supporter of our fundraising activities, we may also need to collect your bank account or credit card details.

Service recipients, program participants or clients of our other services: as a recipient of, or participant in, one of our many services and programs (such as recovery, coaching, counselling, social or other services and programs), we may need to collect your name and contact details, information regarding your physical health, mental wellbeing and emergency contact details.

Customers: as a customer at one of our many live Hives and/or online store we may need to collect your name and contact details at the time of purchase or in connection with your donation.

Personnel: as an employee, volunteer, member or Director of Spirit Hive, we may need to collect information about your name and contact details, bank account and taxation details, qualifications, previous experience and emergency contact details.

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3. How we collect and keep safe your personal and sensitive information

How we collect and store personal and sensitive information varies depending on the purpose for which it is collected but may include the collecting of:

- copies of your written correspondence with us;
- copies of receipts and/or transaction records in relation to your financial support of our fundraising activities;
- copies of your application form, request for assistance and/or other associated documents (including documents generated during your participation in a program with, or otherwise during your interactions with us) and information that you may provide to us in relation to one of the many services and programs we offer; and
- copies of your volunteer agreement or employment agreement and any associated documents and information you provide to us in connection with your volunteering for or employment with Spirit Hive. We may keep copies of the above documents (in physical or electronic form, at our election) as is necessary to carry out our functions and provide our services and programs. All personal and sensitive information is securely stored at all times by us or an authorised external service provider and only authorised people will have access to the above documents and information.

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4. Why we collect and hold personal and sensitive information

We may collect, hold, use and disclose personal and sensitive information for purposes necessary to carry out our functions and provide our services and programs. Generally, these purposes include:

- to keep in contact with you as a supporter of Spirit Hive and to inform you about the role and extent of our work and mission;
- to manage our fundraising activities and for taxation record-keeping purposes associated with your donation to Spirit Hive;
- to assess your welfare needs and to provide you with the welfare and community services and assistance we offer;
- to provide you with the necessary care and assistance during your time as a recipient of services from, one of our facilities or live Hives:
- to provide you with the services requested by you from us;
- to facilitate and manage your purchase from, or donation through our live Hives or online store
- to comply with necessary business and accounting standards;
- to comply with our reporting obligations to the Australian Taxation Office and other government agencies and public sector bodies; or
- to facilitate and manage your employment relationship or volunteer arrangement with Spirit Hive.

We are committed to maintaining your privacy and we will only use your personal and sensitive information for a permitted purpose for which we have collected the information.

You have the option of not identifying yourself or using a pseudonym when dealing with us in relation to a particular matter, unless we believe it is impracticable to do so in the circumstances. If you wish to deal with us in this manner, you must tell us in writing so that we can consider if your request is practicable.

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5. How we may share your information

If necessary to carry out our functions and provide our services and programs, we may need to disclose your personal and sensitive information to external service providers (such as information technology service providers, legal service providers, counselling services, psychologists, mailing houses, call centres, other community service providers, etc.) and other organisations.

We will only share your personal and sensitive information in accordance with your express consent and instructions, subject to the exclusions set out in the Australian Privacy Principles, or in accordance with the specific Privacy Notice provided to you by us at or near the time of collection of your personal and sensitive information.

We do not supply our database information to other marketing organisations not acting on our behalf.

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6. How we use Google Remarketing

We do not collect any personal information on visitors to our website. We do collect non-personal information that allows us to log information about visitors to our website for statistical purposes, such as:

- the number of unique sessions as identified by server address and top-level domain name (e.g. .com, .gov, .org, etc.);

- the number of page hits;
- the pages accessed or downloaded by session;
- the type of browser being used;
- the length of time spent on the site and on particular pages;
- the device being used (e.g. desktop or mobile); and
- the type of mobile device being used (e.g. iPhone 4).

In addition:

- we have implemented and use Display Advertising;
- we use Remarketing with Google to advertise online;
- third-party vendors, including Google, show our ads on sites across the Internet;
- we and third-party vendors, including Google, use first-party cookies (such as the Google Analytics cookie) and third-party cookies (such as the DoubleClick cookie) together to inform, optimise, and serve ads based on someone's past behaviour to our website; and
- users can opt out by utilising Google's Opt-Out Browser Add On (<https://tools.google.com/dlpage/gaoptout/>) and/or Ads Preferences Manager (<https://www.google.com/settings/ads/>).

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7. What international disclosure do we make

Spirit Hive is an international movement with the plans to have a presence in over 50 countries. While every effort is made to keep personal and sensitive information we hold in Australia only, in order to carry out our functions and provide our programs and services we may need to disclose personal and sensitive information to overseas recipients. In the unlikely event such disclosure is required it will generally involve disclosure to international territories of Spirit Hive and only to the extent necessary to carry out our functions and provide our programs and services.

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8. How you can access and seek correction of your personal and sensitive information

You have the right to access your personal and sensitive information, subject to some exceptions allowed by law. If you would like to access or seek correction of your personal and sensitive information, please contact our National Privacy Officer at the contact details below. For security reasons you will be asked to put your request in writing.

To enable us to verify your request we require you to advise the following:

- Your full name
- Address
- Contact phone number
- The relevant department or service (if known) that your request relates to

There is no application fee for making a request to access your personal and sensitive information. While we do not normally charge for providing individuals with access to their personal and sensitive information, we reserve the right to charge you for our reasonable costs in complying with a request for access. These costs will not be excessive.

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9. How you can complain about a breach of the Australian Privacy Principles

Principles

We are committed to protecting your privacy and upholding the Australian Privacy Principles. If you believe we have breached the Australian Privacy Principles please contact our National Privacy Officer with your concerns at the contact details below.

We take all complaints very seriously and we will endeavour to respond to your complaint and address your concerns as soon as reasonably practicable.

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10. How we comply with the Notifiable Data Breaches Scheme

We will notify you in the event your personal information is involved in a data breach that is likely to result in serious harm. This notification will include recommendations about the steps you should take in response to the breach. We will also notify The Australian Information Commissioner of eligible

data breaches. Each suspected data breach reported to us will be assessed to determine whether it is likely to result in serious harm, and as a result require notification.

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Last Updated: 22 February 2018

11. How you can contact our National Privacy Officer

We welcome and appreciate your feedback or comments in relation to our Privacy Policy and the collection of personal and sensitive information. If you have any questions in relation to privacy please contact our Privacy Officer at the contact details below.

National Privacy Officer

Spirit Hive Limited

PO Box 5371 Maroochydore BC QLD 4558

Email: info@spirithive.org