



CLIMBERS ASSOCIATION OF WESTERN AUSTRALIA

# Privacy Policy

Dated 22 February 2023

## 1. Purpose

The purpose of this policy is to outline the collection, use, storage and disclosure of personal information about CAWA Members.

## 2. Scope

This Policy applies to CAWA in all its functions, activities and operations.

## 3. Statement of policy

### **Your privacy is important to us**

CAWA is committed to protecting the privacy of individuals, including members and customers. CAWA abides by the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cth). The APPs regulate the way certain entities handle personal information. Privacy of your personal information is important to us and we conduct our organisation with the highest standards of personal and corporate integrity. We aim to provide the best possible service, whilst ensuring you are aware of how your personal information is used within CAWA. By providing your personal information to us, you agree to our collection, use and disclosure of your personal information (including sensitive information such as health information) in accordance with this Privacy Policy.

### **What is personal information?**

Personal information is 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.

## **What personal information do we collect and hold?**

We will always be open and honest in our dealings with you and will only collect information about you that we believe is necessary to undertake our legitimate activities. The nature of the personal information we collect will be dependent upon your chosen level of interaction with CAWA, and the degree to which you utilise the broad range of CAWA benefits, products and services. Generally, the personal information is comprised of your name, gender, address, date of birth, and telephone and email contact details. Further specific details may be required for different types of transactions and membership interactions (i.e., attendance at events/activities that require medical/contact information). CAWA also retains transactional histories of your usage of CAWA services for audit purposes and to assist in understanding your circumstances, preferences and service needs.

For employment applications, we collect your name, address, contact details, current and past employment information, educational qualifications and professional associations. We also collect information about and proof of your residency status, the name and contact details of your referees and other information required for recruitment purposes. Where we seek your consent to conduct a background check, we also collect details of your proof of identity from you.

## **How do we hold your personal information?**

We may hold your personal information in a number of ways, including:

- on our IT systems and databases, which may include storing your data on a third party supplier's system;
- in hard copies (paper files).

We may combine personal information we receive about you with other information we hold about you. This includes information collected for different products and services. We may hold your personal information as long as we need it for any purpose for which we may use or disclose it, or longer if required by law.

## **Why is the information collected and how is it used?**

Generally, we collect personal information necessary to validate your identity and to ensure your request or enquiry can be actioned efficiently and effectively. Collection of personal information is necessary to undertake many of the broad range of transactions offered by CAWA, including:

- to process an application or renewal for CAWA Membership;
- to process a request for another CAWA product or service;
- to register you to attend events or activities conducted by CAWA or a third party provider;
- to respond to any query sent to us by you;
- to handle complaints and disputes;
- to use in accordance with any other purpose which is stated to you at the time of collection or that you otherwise authorise;
- to detect, investigate and prevent fraud;
- to train our employees;
- to assess and process employment applications; and

- to satisfy legal requirements.

### **How do we collect your personal information?**

In most cases, we only collect information about you directly from you either in person, in writing, email, through our online services and by telephone. However, there are circumstances where this is impractical such as a parent providing information on behalf of a Youth Member. In some circumstances, we may also collect your personal information from:

- third parties who you have asked to provide your personal information to us, including your referees;
- our agents and service providers;
- people who are involved in a claim or assist us in assessing, investigating, processing or settling claims, including third parties claiming under your policy, witnesses, external claims data collectors and verifiers, and your employer;
- law enforcement, dispute resolution, statutory and regulatory bodies;
- industry databases;
- publicly available sources such as the Internet and telephone directories;
- the general public when it is unsolicited and may be relevant to a particular policy or fraud investigation.

Unless we are required or permitted by law to collect sensitive information about you, we will only do so after obtaining your consent. If you provide personal information about a third party individual to us you need to ensure that the individual is aware of, understands and agrees to the collection, use and disclosure of his or her personal information in accordance with this Privacy Policy.

### **What if you don't want to provide certain personal information?**

We only collect information that we believe is necessary to undertake a specific transaction or function. Therefore, refusal to supply requested details may delay or prevent us from satisfying your request, be it a Member application, or application for one of our other services.

### **Disclosure of personal information**

Any personal information collected, held or used by CAWA is kept strictly confidential and is only accessed by authorised CAWA members, agents, contractors or service providers in the course of them undertaking their legitimate duties in providing a given product or service and managing our organisation. Only information necessary for the particular function is shared with the relevant service provider. Member or customer information will not be given, rented, sold or traded to any external third party organisation and will only be made available to a third party:

- where CAWA has contracted an external service provider to assist in the execution of CAWA's legitimate activities, including IT service providers, providers of consultancy services and professional advisors;
- if disclosure is required by or authorised by law; or
- if you consent to the disclosure of specific information to third parties.

## **How we protect your personal information**

Reasonable steps are taken by us to protect personal information we hold from misuse, interference, loss, unauthorised access, modification or disclosure.

## **Contacting CAWA about access to and/or correction of your personal information**

CAWA aims to ensure the personal information it collects, uses and discloses, including the personal information of its Members, is accurate, up to date, complete and relevant. If you would like to access your personal information or feel that the information we currently have on record is inaccurate, irrelevant, out of date or incomplete, please contact us on [cawa@climberswa.asn.au](mailto:cawa@climberswa.asn.au). We will need to verify your identity before giving you access. We will comply with any such request except where the Privacy Act 1988 or Australian Privacy Principles allow us to refuse to do so. There is no fee for making such a request. We will endeavour to respond to such a request within 14 days.

## **Comments and complaints regarding Privacy**

If you have a problem with how CAWA has used your personal information or are concerned about any aspects of CAWA's Privacy Policy, we want to hear from you. The Secretary of CAWA has authority to deal with any privacy matter and will be able to explain your rights and any referral that may be necessary in order to resolve the matter. Any formal privacy complaint will be dealt with by the CAWA Secretary, or if necessary, may be referred to the President, who has the appropriate authority to deal with disputes. Privacy-related comments and complaints may be lodged online. Our contact details are as follows:

Email: [cawa@climberswa.asn.au](mailto:cawa@climberswa.asn.au)

In the unlikely event that your complaint is unresolved, you are unhappy with the resolution of your complaint or with the way CAWA has handled your complaint, you may contact the Office of the Australian Information Commissioner which may investigate your complaint further. However, they will only become involved when all internal avenues have been exhausted. Their contact details are as follows:

Office of the Australian Information Commissioner  
GPO Box 5218 Sydney NSW 2001  
phone: 1300 363 992  
[www.oaic.gov.au](http://www.oaic.gov.au)

## **Changes to this Privacy Policy**

This Privacy Policy may change from time to time. Any revised version will be posted on the CAWA website.

# **4. RESPONSIBILITIES**

CAWA's Secretary is responsible for establishing the governance accountabilities for the privacy and security of data held by CAWA.

The Secretary is responsible for:

1. Overseeing security of data and information held by CAWA;
2. If necessary, provision of guidelines to support the implementation of this Policy; and
3. Monitoring and reviewing this Policy.