

Privacy of Personal Information Policy

Contents

Privacy of Personal Information Policy	1
Background	1
What is Personal Information and Why Do We Collect It?	2
Sensitive Information	3
Reporting to U3A Network Victoria	4
NDS Reporting Information	4
Personal Information entered into NDS	4
Disclosure and Security of Personal Information	5
Disclosure of Personal Information	5
Security of Personal Information	5
Online Applications	5
Access to your Personal Information	6
Maintaining the Quality of your Personal Information	6
Procedures	6
Policy Updates	7
Privacy and Data Security Policy Complaints and Enquiries	7

Privacy of Personal Information Policy

The Privacy of Personal Information Policy has been developed for the purposes of protecting U3A Yarra City members' personal information and data in line with known best practice.

For the purposes of this document

“We” and “Us” means U3A Yarra City and its committee of management.

“You” means members of U3A Yarra City and any non-member person (such as tutors and volunteers) acting on behalf of U3AYarra City.

Background

U3A Yarra City collects personal information from members so that we can provide services consistent with our primary aim: the provision of educational and recreational activities for mature adults. This means we may use this information for communication, administration, planning, program development and delivery, quality control, research and maintenance of membership records.

U3A Yarra City is committed to safeguarding privacy of personal information. Overall responsibility for this policy rests with our Committee of Management.

We seek to abide by the *Privacy and Data Protection Act 2014 (Vic) (PDP Act)*. The Act is administered by the Office of the Victorian Information Commissioner (OVIC) at <https://ovic.vic.gov.au/>. Our U3A seeks to comply with the Victorian Protective Data Security Framework and the Victorian Privacy Principles (VPPs).

Related policies:

- Use of the U3A's IT Network
- Bring Your Own Device

What is Personal Information and Why Do We Collect It?

Personal Information may include

- Name
- Year of birth
- Postal, street and email addresses
- Telephone contact numbers
- Previous profession or occupation
- Skills or interests
- Emergency contact details
- Images such as a photo or video*
- Other information you provide through member surveys or for other purposes.

* Any photographer who intends to record an image of a person or a group of people must advise the person or group of his/her intentions. Any person who may potentially be included in a photo or video can request that their image be excluded, removed or made unrecognisable. In this instance, the photographer must comply with the request.

U3A Yarra City will collect personal information about each member directly from the member in question. Personal information will be collected mainly via online forms completed in the process of applying for and renewing membership, or registration for events.

Personal information may also be collected via:

- Correspondence
- Telephone
- Email
- Voice and video recordings
- Our website
- Subscription to our newsletters

We do not guarantee any websites which are accessed from our website via links or the policy of authorised third party software providers.

We collect personal information from members so that we can provide services and perform functions that are consistent with our constitution, including:

- To make classes and other activities available to members
- For communication, administrative, marketing and planning purposes
- For program development, quality control and research purposes
- To maintain accurate and up-to-date membership records

We will:

- Only collect information that is consistent with our primary purpose and Rules of Association
- Inform members of the reason why information is collected and how it is used
- Inform members that any personal information held about them is accessible to them
- Take all reasonable steps to ensure that personal information held is accurate and up to date
- Take all reasonable steps to ensure that personal information held is protected from misuse, loss and unauthorised access.
- Enable members to advise us that they decline to allow use of their image.
- Advise tutors and members that members can decline the capture and use of their images or video recordings.

Members' personal information will not be shared or disclosed other than as described in this policy. Personal information will not be made available to others for direct marketing purposes.

We may disclose your personal information, for purposes that are directly relevant to our Rules of Association, to:

- Our volunteers, for example, tutors and members of the Committee of Management, where it is necessary in order to undertake duties relevant to our primary purpose
- Employees, contractors or service providers where it is essential to the service to be provided.

When we collect personal information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it. We will only transfer your personally identifiable information to hosting services which meet or are deemed equivalent to the Victorian Privacy Principles.

We cannot provide any assurance regarding the security of transmission of information you communicate to us via unsecured or public Wi-Fi. These communications will be at your own risk.

Sensitive Information

Sensitive information is defined in the PDP Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership

of a trade union or other professional body, criminal record or health information. Our U3A does not collect sensitive information except health information that may be required and as approved by the member.

Reporting to U3A Network Victoria

Under the terms and conditions for membership of U3A Network Victoria, we are required to report deidentified statistics about our membership annually. The current requirement is to report in May each year.

In order to report, we must enter the required reporting details into the Network Data System (NDS). Entry to the NDS is obtained via the Network website, and then logging in using a unique ID and passcode supplied to us.

NDS Reporting Information

The categories of information collected currently through NDS include:

- U3A details
- Office bearers
- Numbers of members
- Age breakdown by male and female, and other
- Volunteer numbers and hours

The information is used by Network to:

- Calculate annual subscriptions to be paid to the Network.
- Demonstrate growth in membership over time to funders
- Communicate with U3As and their Presidents, Secretaries and other key position holders
- Record key U3A representatives
- Allow the public to search via the Network website for a U3A in their area

Apart from entering our own data, we are not able to access NDS to view the details about other U3As.

Personal Information entered into NDS

Each U3A is required to enter the name, email address, home and mobile numbers of key office bearers including:

- President
- Deputy President
- Secretary
- Treasurer
- Course Coordinator
- Council Delegate

Disclosure and Security of Personal Information

Disclosure of Personal Information

Your personal information may be disclosed in a number of circumstances including the following:

- Third parties where you consent to the use or disclosure
- Where required or authorised by law
- In the case of an emergency

Security of Personal Information

We store our data with the U-MAS database, which is an encrypted, cloud-based application. Their servers are located in NSW.

Encrypted back-up files are downloaded from U-MAS and held on a portable hard drive, kept in a secure place and retained for a maximum of seven years. The encrypted copy is also stored on Google Drive. Only authorised officers have access to this.

We use a combination of people, process and technology safeguards to store personal information in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure.

Some personal information is stored in digital files and held in the desktop in the U3A office, which is also backed up onto a portable hard drive, kept secure and retained by us for a maximum of seven years. A copy is also stored on Google Drive.

Our U3A uses the following physical security and access strategies to protect information stored at our office:

- The desktop is password-protected
- The office is kept locked except when used either for classes, committee meetings or office duties. The numbered keys are the property of the City of Yarra and held by named officers, with the City of Yarra maintaining a duplicate record of the key-holders. An additional key can be obtained by registered U3A members from Collingwood Library who hold a record of pre-registered names.

Similarly, access to U-MAS database is password-protected, and levels of access controlled according to need.

Online Applications

Our website uses the WordPress platform and is hosted by VentrailP. This platform uses visitor data in the form of IP addresses which then generate random numbers

which are analysed by Google Analytics. We reserve the right to perform statistical analysis of user behaviour on our website and emailed bulletins using tools such as Google Analytics and Mail Chimp.

Our U3A uses Zoom for video-conferencing. Zoom meetings can be recorded locally by the host. Participants can take screen shots. Zoom recordings are encrypted with complex passwords by default. The expectation of tutors and other members who are recording a Zoom session as part of a U3A meeting or activity is that participants are warned that the session is being recorded.

Access to your Personal Information

You may access the personal information we hold about you and update or correct it, subject to certain exceptions. Most personal information is entered into the U-MAS database by you and is thereafter accessible and editable by you. If you wish to access other personal information, please contact us in writing.

We will not charge any fee for your access request.

In order to protect your personal information we may require identification from you before releasing the requested information.

Maintaining the Quality of your Personal Information

It is important to us that your personal information is up to date. We will take reasonable steps to make sure that your personal information is accurate, complete and up to date. If you find that the information we have is not up to date or is inaccurate, please update it yourself (if on U-MAS), or advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

Procedures

- Members may request access to any personal information our U3A holds about them by contacting our Secretary who will aim to provide a suitable means of accessing the information
- Where a member believes that personal information held about them is incomplete or inaccurate the member may ask the Secretary for it to be amended
- Where a member believes their privacy has been breached, they should contact our Privacy Officer via the Secretary and provide details of the incident so that it can be investigated
- Any questions or concerns about this policy, or a complaint regarding the treatment of personal information, should be referred to our Privacy Officer via the Secretary
- We will treat confidentially all requests or complaints lodged regarding this policy. We will contact you within a reasonable time after receipt of your complaint to discuss your concerns and to outline options regarding how they

may be resolved. We will aim to ensure that your complaint is resolved in a timely, impartial and appropriate manner.

Policy Updates

This policy may change from time to time and is available on our website.

Privacy of Personal Information Policy Complaints and Enquiries

If you have any queries or complaints about this policy, please contact us at:

Address: 17 Stanton Street, Abbotsford, VIC 3067

Email: u3ayarracity@gmail.com

Telephone: 0459 779 872

Version 1.1	Data Privacy and Security Policy: Data Privacy and Security Statement
Version 1.2	Privacy of Personal Information Policy
Endorsed by U3A Yarra City Committee of Management	Version 1.1 Date: 11/08/2021 Version 1.2 Date: 11/10/2023