



Rats of Tobruk Association Inc.

Privacy of Information

Rats of Tobruk Association Inc. (ROTA Inc.) is committed to protecting the privacy of its members across all other organisational areas within ROTA Inc. Victoria Branch.

Policy Statement

Personal information about members including information that could identify a member must only be collected, used, disclosed and stored in accordance with the following policy.

Procedures

1. Collecting, using and disclosing personal information

- a) All reasonable steps will be made to make sure that personal information collected, used or disclosed is accurate, complete and up to date.
- b) **In the case of a ROT veteran, covering these headings: Tobruk A-K, Tobruk L-Z, Fallen KIA, POW, Polish & Pending [those awaiting documentary evidence to support their application] where personal information is collected primarily for the purposes of:**
 - **Maintaining membership records for use in the Database**
 - **To record their name, rank, enlistment number and awards/decorations**
 - **Information displayed on our website as reference material, is available to the public for research purposes only.**
 - **Information such as date of birth, address, postal address, telephone numbers, email address and comments are NOT to be made available to the public via public forums such as Facebook, twitter, Tobruk House News, print/electronic material and or the Rats of Tobruk website, www.ratsoftobrukvictoria.org.au .**
- c) The contact information included in the Affiliate Member's application, (including but not limited to Non Tobruk, Relatives, NSAA, Band, Service, Reserves, other members, Associates, Junior Rats and any other title not listed in the ROT veteran group is:
 - Intended for the sole purpose of communicating with the Affiliate Member regarding membership, Tobruk House News, events specific to the purpose of ROTA Inc. and its Officers charged within the Association to perform nominated roles.
 - **Information such as group, name, gender, date of birth, descendant's relationship to ROT veteran, address, postal address, telephone numbers, email address, are NOT to be made available to the public via public forums such as Facebook, twitter, Tobruk House News, print/electronic material and or the Rats of Tobruk website, www.ratsoftobrukvictoria.org.au**



- d) Any use of email addresses, home or business addresses, phone numbers, or other contact information is not permitted to be disseminated outside of ROTA Inc. It is only to be used by its Officers charged within the Association to perform nominated roles.
- e) Failure to provide the information required in (d) may mean ROTA Inc. is unable to complete a membership application/record.
- f) Approval to use a member's image/s in publications must be sought at the time when applying for or renewing membership.
- g) Only relevant personal information about a member is to be disclosed to; the Executive Committee, General Committee members and when necessary to external service providers (for example our printer for postage in association with mailing of the Tobruk Hose News). Unless otherwise approved, external providers must agree not to disclose the information to another party and when the external service is no longer required provide assurance that the information has been securely destroyed.
- h) If personal information about a member is sought by emergency services personnel or on behalf of a law enforcement body:
 - All reasonable steps will be taken to ensure the member is made aware of the requirement
 - Except in the situation that making the member aware of the requirement would pose a serious threat to the life or health of any individual
 - Or where non-disclosure is likely to jeopardise the prevention, investigation, detection or remedying of serious improper conduct.
- i) Sensitive personal information will only be collected from the member with the member's consent or knowledge for the purposes of; health related issues to ensure the member can receive appropriate service from health professionals in an emergency.
- j) Any request from a member to further restrict access to his or her information must be dealt with in pursuant to Section 59 of the *Associations Incorporation Reform Act 2012 (the Act)*

2. Security of information

- a) **All reasonable steps are to be taken to protect all forms of personal information from misuse, loss, unauthorised access, modification or disclosure. Only members authorised by the Secretary will have access to data and administrative files containing personal information, for the use within the specific roles that they are performing.**
- b) Members or applicants for new membership who at any time provide personal details via the internet do so at their own risk.

3. Register of Members

- a) Pursuant to Division 3 of *the Act* a member must be given a reasonable time to inspect the Register of Members.
- b) Making an unauthorised copy or transcript of information contained in the register is not permitted.



4. Accessing Personal Information

If for any reason access is denied to a member of his or her personal information, for example in circumstances where it would become unlawful to do so, or the information relates to legal proceedings and the information would not be accessible by the process of discovery in those proceedings, or the information would prejudice an investigation of or prosecution of possible or alleged unlawful activity, the Secretary will notify the member of the refusal and where possible the basis for it.

5. Making changes to personal information

A member may request any inaccuracies in his or her personal information be corrected. The Secretary must authorise any subsequent changes and if required to ensure the Register of Members and any other records are amended accordingly.

6. Lodging a complaint

- a) For any matters associated with privacy of information, including the lodgement of a complaint, the Secretary is authorised to deal with the concerns, complaints or any other issues.
- b) Where a member believes a breach of his or her privacy has occurred, the member should provide details to the Secretary who will determine a course of action.
- c) If a complaint is received the Secretary will arrange for the complaint to be investigated in a timely manner.
- d) When a complaint alleging a breach of privacy is received the Secretary must provide details of the complaint to the Committee and keep the Committee informed about action being taken to investigate and resolve the complaint.

7. Photo permissions

- a) ROTA Inc. must secure appropriate permissions to use any image of an individual to be used for promotional purposes.
- b) ROTA Inc. requires permission for photos or videos of students, participants, visitors or other subjects who are being featured in online & print including newsletter articles, advertisements or marketing campaigns in which the person's name or image is being used in a content that implies endorsement. Photo release forms are available from the Editor.
- c) At a minimum, ROTA Inc. photographers will identify themselves & inform subjects about the potential uses of the photo, such as providing information for a news story and/or creating images to broadly represent ROTA Inc. now & in the future.

8. Our privacy policy

ROTA Inc. Privacy Policy addresses the use, collection & security of & access to personal information.

A copy of this policy is contained in the *Policies and Procedures Manual* held in the library at Tobruk House and is also available on the website at www.ratsoftobrukvictoria.org.au

