

Policy Name:	MSI AP Privacy Policy
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1.0 Scope

This privacy policy outlines how MSI Asia Pacific ABN 79 082 496 697 (referred to as MSIAP, MSI, we, us or our) manage Personal Information, including information about what kinds of Personal Information we may collect or hold, how we collect, hold, use and disclose that Personal Information, choices you have regarding our use of that Personal Information, and your ability to access or correct that Personal Information.

This privacy policy has been prepared in accordance with the Australian Privacy Principles established by the *Privacy Act 1988* (Cth).

2.0 Collection of Personal Information

We only collect Personal Information that is reasonably necessary for us to provide you with the relevant services and to perform our functions. The types of Personal Information we may collect about an individual will depend upon the nature of our interaction with them. Personal Information that we collect may include (but is not limited to) the following:

- (a) name
- (b) age and/or date of birth
- (c) contact details including telephone numbers (landline and/or mobile)
- (d) current address (including postal address)
- (e) email address

- (f) gender
- (g) ethnicity, including Aboriginal Torres Strait Islander identification
- (h) cultural or religious beliefs
- (i) marital status
- (j) language spoken
- (k) country of birth
- (l) payment details, such as your credit card or bank account details
- (m) information about the enquiries made, including type, comments and call back preferences of enquirer
- (n) occupation and employment details including employment status and any previous work experience
- (o) information from or in connection with your resume or job application if you apply for a position with us

When providing your personal information to us, some information may be identified as mandatory or voluntary. If you do not provide the mandatory data, we may not be able to effectively provide our services to you.

You may seek to remain anonymous or use a pseudonym when you deal with us. However, there may be circumstances where we are required or authorised by law to only deal with you if you have identified yourself or it is impracticable for us to deal with you without you identifying yourself.

Who we collect information about

2.2 We collect and record Personal Information about individuals such as:

- (a) our donors, potential donors and subscribers
- (b) our suppliers and potential suppliers and their representatives, directors, partners, proprietors and shareholders
- (c) contractors and subcontractors and potential contractors and subcontractors, and community workers and their representatives in relation to providing goods and services to us

- (d) our employees past and present, including applicants, and
- (e) any other person who comes into contact with MSI.

2.3 We may collect your personal information in the course of providing you with information, goods or services, or:

- (a) when you become a donor or enquire about being a donor
- (b) when you use or interact with our digital services
- (c) when you provide information to us in any way (including by completing a form, disclosing information over the phone or via email, or providing us a business card)
- (d) when you request information about us, our products or our services
- (e) when you provide feedback to us
- (f) when you subscribe to our mailing list
- (g) when you submit a job application to us
- (h) when you otherwise contact us by telephone, fax, email, social media, post or in person, or
- (i) where we are otherwise required or authorised by law to do so.

Donation records and collecting payment information

2.4 If you are making a donation through our website, you will be required to submit your relevant payment information including bank account details, credit card details, billing address and invoice details. The payment information you submit through our website will be managed by Stripe, with headquarters located at 185 Berry Street, Suite 550, San Francisco, CA 94107. You can see Stripe's data retention policy [here](#).

This data is also stored by Raisely, our fundraising platform. You can see Raisely's data retention policy [here](#).

When providing your payment information, some information may be identified as mandatory or voluntary. If you do not provide the mandatory data, Stripe may not be able to effectively process your donation.

2.5 Your bank account details, credit card details, billing address and other such information is also collected through our Customer Relationship Management software.

In most cases we will collect personal information directly from you. This may take place when you provide us with your personal information through our website, in person, over the telephone or by completing documents such as an administrative form. We will only collect your personal information from a third party if you consent to the collection or where it is unreasonable or impracticable to collect the information from you.

Combining and linking personal information

2.6 In some cases, we will link or combine personal and/or payment information gathered from phone conversations, transaction records and online communications.

3.0 Information collected via our websites and digital services

3.1 Personal information may be collected by us and by our third-party service providers who assist us in operating our websites at: mschoices.org.au, including the subdomains and any other website we operate from time to time (collectively 'our websites').

3.2 We may use various technological methods from time to time to track the visiting patterns of individuals accessing our Website, including but not limited to the methods set out in this paragraph 3.

Google Analytics

3.3 We use Google Analytics to help analyse how you use our Websites. Google Analytics generates statistical and other information about website use by means of cookies, which are stored on users' computers. The information generated is used to create reports about the use of our Websites. Google will store this information. We will not (and will not allow any third party to) use Google Analytics to track or to collect any personally identifiable information of visitors to our Websites. We will not associate any data gathered from this Website with any personal information from any source as part of our use of Google Analytics.

3.4 If you do not want your Website visit data reported by Google Analytics, you can install the Google Analytics opt-out browser add-on. For more details on installing and uninstalling the add-on, please visit the Google Analytics opt-out page at <https://tools.google.com/dlpage/gaoptout>.

Click Stream Data

3.5 When you read, browse or download information from our Websites, we or our internet service provider may also collect information such as the date, time and duration of a visit, the pages accessed, the IP address of your computer, and any information downloaded. This information is used for statistical, reporting and website administration, maintenance and improvement purposes only and will not be used to identify you. However, in the event we experience an issue with our Website we may utilise click stream

data to identify you, the purpose of identification is solely to notify you of any messages or alerts you may have missed as a result of the incident we experienced.

Cookies

3.6 Our Websites may use ‘cookies’ from time to time. Cookies are small text files that are transferred to a user’s computer hard drive by a website for the purpose of storing information about a user’s identity, browser type or website visiting patterns. Cookies may be used on our Websites to monitor web traffic, for example the time of visit, pages visited and some system information about the type of computer being used. We use this information to enhance the content and services offered on our Websites.

3.7 Cookies are sometimes also used to collect information about what pages you visit and the type of software you are using. If you access our Websites or click-through to one of our Websites from a link in an email we send you, a cookie may be downloaded onto your computer’s hard drive.

3.8 Cookies may also be used for other purposes on our Websites but in each case none of the information collected can be used to personally identify you.

3.9 You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. Each browser is different, so check the “Help” menu of your browser to learn how to change your cookie preferences.

3.10 If you disable the use of cookies on your web browser or remove or reject specific cookies from our Websites or linked sites then you may not be able to gain access to all of the content and facilities in those websites.

Web Beacons

3.11 Web beacons are images that originate from a third party site to track visitor activities. We use web beacons to track the visiting patterns of individuals accessing our Websites.

Third party content (e.g. social media links)

3.12 Some of the content on our Websites includes applications made available by third parties, such as social media buttons or links that allow you to share content or links to our Websites through the relevant third-party platforms. From time to time, we may utilise third party platforms to provide you with advertising information about us. These third-party applications themselves may also facilitate collection of information by those third parties, through your interaction with the applications and sometimes even if you do not interact directly with them. We are not responsible for the technical operation of these applications or the collection and use practices of the relevant third parties. Please visit the relevant third-party websites to understand their privacy practices and options they may make available to you in relation to their collection of your Personal Information.

SMS

3.13

Terms and conditions

By opting into messages, you agree to receive recurring automated marketing and informational text messages from MSI Asia Pacific. Automated messages may be sent using an automatic telephone dialing system to the mobile telephone number you provided when signing up or any other number that you designate.

Message frequency varies, and additional mobile messages may be sent periodically based on your interaction with MSI Asia Pacific. MSI Asia Pacific reserves the right to alter the frequency of messages sent at any time to increase or decrease the total number of sent messages. MSI Asia Pacific also reserves the right to change the short code or phone number or alphanumeric sender where messages are sent

Your usual message and data rates may apply. If you have any questions about your text plan or data plan, it is best to contact your mobile provider. Your mobile provider is not liable for delayed or undelivered messages.

Your consent to receive marketing messages is not a condition of purchase.

3.14

Carriers are not liable for delayed or undelivered messages.

3.15

Messages will provide instructions to unsubscribe either by texting STOP or through an included link. After you unsubscribe, we will send you a message to confirm that you have been unsubscribed and no more messages will be sent. If you would like to receive messages from MSI Asia Pacific again, just sign up as you did the first time and MSI Asia Pacific will start sending messages to you again.

3.16

For support regarding our services, email us at supporter@msichoice.org.au or, if supported, text "HELP" to at any time and we will respond with instructions on how to unsubscribe. If we include a link in messages we send you from MSI Asia Pacific, you may also access instructions on how to unsubscribe and our company information by following that link.

3.17

You agree that before changing your mobile number or transferring your mobile number to another individual, you will either reply "STOP" from the original number or notify us of your old number at supporter@msichoice.org.au. The duty to inform us based on the above events is a condition of using this service to receive messages.

3.18

We reserve the right to change or terminate our messaging program at any time. We also reserve the right to update these Messaging Terms at any time. Such changes will be effective immediately upon posting. If you do not agree to a change to these Messaging Terms, you should cancel your enrolment with our messaging program. Your continued enrolment following such changes shall constitute your acceptance of such changes.

4. How do we use your Personal Information?

4.1 We use the Personal Information we collect about you for our organisational functions and activities, in order to operate our business efficiently, and to market our products and services for the benefit of our patients.

4.2 We may collect, hold and use your personal information:

- (a) to identify and communicate with you
- (b) to enable us to provide you with requested information, products or services
- (c) reporting and resource planning purposes
- (d) to collect and process donations
- (e) to personalise and customise your experiences on our Websites
- (f) to manage and administer any account you may hold with us
- (g) to provide you with information that we believe may be of interest to you or that you may be interested in receiving
- (h) to conduct research for the purposes of improving existing products or services or creating new products or services
- (i) to help us research the needs of our patients to enable us to market our products and services with a better understanding of your needs and the needs of patients generally
- (j) to notify and assess insurance claims, pay settlements and finalise claims, and determine liability
- (k) to protect you and us from fraud
- (l) to help us manage our business operations
- (m) for business support purposes including maintenance, backup and audit

- (n) to process any job application submitted by you
- (o) to respond to any queries or complaints you may have, or
- (p) to comply with our statutory and legal obligations.

4.3 We always reserve the right to monitor, review, retain, and/or disclose any information as necessary to satisfy any applicable law, but we have no obligation to monitor the use of the Websites or to retain the content of any user session.

4.4 You consent to us using your Personal Information in the above ways and as set out in this Privacy Statement.

4.5 We may otherwise collect, use or disclose your Personal Information where the collection, use or disclosure is:

- (a) in accordance with this Privacy Statement or any agreement you enter into with us; or
- (b) required or authorised by law, including without limitation the Australian Privacy Principles under the Privacy Act 1988 (Cth).

5. Disclosure

5.1 MSI Asia Pacific may disclose, or provide access to, your Personal Information to third parties in connection with the purposes described in paragraph 4.1. Depending on the circumstances and the nature of your engagement with us, we may disclose your Personal Information to our related entities, to third parties that provide products and services to us or through us, or to other third parties (such as your referee(s) in connection with a job application you have submitted).

5.2 We may also disclose your Personal Information to:

- (a) any of MSI's internal divisions, business units or departments
- (b) your nominated representatives
- (c) other organisations or individuals who assist us in providing products and services to you
- (d) professional service providers and advisors who perform functions on our behalf, such as lawyers
- (e) medical providers including medical and rehabilitation practitioners for assessing insurance claims
- (f) representatives, agents or contractors who are appointed by us in the ordinary operation of our business to assist us in providing goods or services or administering our business (such as for data storage or processing, printing, mailing, marketing, planning and product or service development)

(g) Government, regulatory authorities and other organisations as required or authorised by law (such as Centrelink, Medicare or the Police).

5.3 We may also disclose your Personal Information to our Website host or software application providers in certain limited circumstances, for example when our Websites experience a technical problem or to ensure that they are operating in an effective and secure manner.

5.4 We may also disclose your Personal Information to a purchaser or potential purchaser in connection with the sale or potential sale of MSI, our business or any of our assets, including in insolvency, in circumstances which require the purchaser or potential purchaser to use such Personal Information consistently with this Privacy Statement.

6. Cross border disclosures

6.1 We operate both in and outside Australia. As such your personal information may be disclosed overseas. For a list of countries in which we currently operate, please visit our [global website](#).

7. Other uses and disclosures

7.1 We may collect, use and disclose your Personal Information for other purposes not listed in this Privacy Statement. If we do so, we will make it known to you at the time we collect or use your Personal Information.

8. Marketing

8.1 You consent to us using your Personal Information for sending you information, including promotional material, about us, as well as the products and services of our related entities and third parties, now and in the future. You also consent to us sending you such information by means of direct mail, email, and text messages. However, we will only send you marketing material if you opt in to receive this material.

8.2 If you do not want to receive marketing information from us, you can do so in any of the following ways:

(a) not giving consent for us to communicate with you through channels you are not comfortable receiving information through;

(b) by clicking on the 'Unsubscribe' or subscription preferences link in a direct marketing email that you have received from us; or

(c) by contacting us using the contact details specified below.

9. Storage and security of Personal Information held by us

9.1 We aim to keep your Personal Information secure. Any Personal Information that is collected via our Websites or which is held on our computer systems is protected by safeguards including physical, technical (firewalls, SSL encryption etc.) and procedural methods.

9.2 If we find that we no longer require or have no further need for your Personal Information we may de-identify it or remove it from our systems and destroy all record of it.

10. You can access and update your Personal Information

10.1 You are entitled to access Personal Information that we hold about you. If we refuse your request to access your Personal Information, we will provide you with reasons for the refusal where we are required by law to give those reasons.

10.2 A request for access can be made by contacting our Privacy Officer in any of the ways specified below.

10.3 We take all reasonable steps to ensure that any Personal Information we collect and use is accurate, complete and up-to-date. To assist us in this, you need to provide true, accurate, current and complete information about yourself as requested, and properly update the information provided to us to keep it true, accurate, current and complete.

10.4 Please contact us in any of the ways specified below if you believe that the Personal Information is inaccurate, incomplete or out of date, and we will use all reasonable efforts to correct the information.

11. How do we deal with complaints?

11.1 If you feel that we have not respected your privacy or that we have conducted ourselves inconsistently with this Privacy Statement, please contact our Privacy Officer in any of the ways specified below and advise us as soon as possible. We will investigate your queries and complaints within a reasonable period of time depending on the complexity of the complaint.

11.2 It would assist us to respond to your complaint promptly if it is made in writing. You can submit a privacy complaint using our online feedback form at msichoices.org.au or any form on any of our websites. You can also call our main switchboard on [1300 478 486](tel:1300478486) and lodge a complaint over the phone.

11.3 Your complaint will be escalated to the Privacy Officer and, depending on the nature of the complaint, will be formally investigated. We will notify you of the outcome of our investigation within 30 days.

11.4 If you are not satisfied with our response, you may lodge a complaint with the Office of Australian Information Commissioner (OAIC) by writing to the OAIC at GPO Box 5218, Sydney NSW 2001. Please visit the [OAIC website](https://www.oaic.gov.au) for further information about the OAIC.

12. Updates to this Privacy Statement

12.1 We may, from time to time, review and update this Privacy Statement, including to consider new laws, regulations, practices and technology. All Personal Information held by us will be governed by our most recent Privacy Statement, posted on our Website at:

[Privacy Policy - MSI Asia Pacific \(msichoices.org.au\)](https://msichoices.org.au/privacy-policy) where the Privacy Statement will be located. Any changes to this Privacy Statement may be advised to you by updating this page on our Website. We encourage you to check this page from time to time for any changes.

13. What to do if you have a question, problem or want to contact us about our use of your Personal Information or this Privacy Statement

15.1 If you:

- (a) have a query or concern about this Privacy Statement or our Personal Information handling processes
- (b) wish to make a complaint in relation to a breach of your privacy
- (c) would like to access your Personal Information held by us
- (d) would like to update or correct your Personal Information held by us, or
- (e) would like to opt out of direct marketing,

Please contact us in any of the following ways:

Email Address: feedback@msichoices.org.au

Mailing Address: 425 Smith St, Fitzroy 3065 Australia

Phone: [1300 478 486](tel:1300478486)

This Privacy Statement was last updated on 17 May 2024.