



## Privacy Policy

VERSION NUMBER	RELEASE DATE	NEXT REVIEW DATE	REVIEWER	CHANGES
1.0	17 October 2023	October 2025	Director Legal and Assurance	
Version Number	Review Date	Next Review Date	Reviewer	
2.0	25 May 2026	May 2028	Board	Updated to align with Privacy Legislation



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## 1 How Personal Information is used

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The Fund will use or disclose Personal Information, including Sensitive Information, for the primary purpose of:

- a) assessing eligibility for financial assistance or other forms of support;
- b) verifying information provided as part of an application, including financial and medical information;
- c) determining the nature and level of assistance to be provided;
- d) administering and delivering support, including processing payments;
- e) communicating with applicants, beneficiaries and / or their authorised representatives.

Personal Information may also be used or disclosed for a directly related purpose that would reasonably be expected by individuals, including:

- a) internal administration, record keeping and governance of the Fund;
- b) reporting to the Fund's Board or relevant oversight bodies (including, where appropriate, in a de-identified form); and
- c) managing appeals, complaints and enquiries.

The Fund will not use or disclose Personal Information for a purpose other than that for which it was collected unless:

- a) the person to whom the information relates has consented to the use or disclosure of the information for that other purpose;
- b) the person would reasonably expect the Fund to use or disclose the information for that other purpose and the other purpose is directly related to the purpose for which the information was collected (and, in the case of Sensitive Information, where required, the individual has consented);
- c) a "permitted general situation" as defined under the Privacy Act 1988 (Cth) applies, including:
  - where the use or disclosure is necessary to prevent or lessen a serious threat to the life, health or safety of a person or to public health or safety;
  - where the use or disclosure is reasonably necessary for the establishment, exercise or defence of a legal or equitable claim;
- d) where the use or disclosure is required or authorised by law and/or for law enforcement purposes; or
- e) the Fund reasonably believes that the use or disclosure is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.



## 2 Disclosure of Personal Information

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The Fund may disclose personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this Policy.

The Fund will only supply personal information to a third party when it is required for the purposes of assessing applications and delivering support to a beneficiary.

However, the Fund may from time to time need to disclose personal information to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, in the course of a legal proceeding or in response to a law enforcement agency request.

The Fund may also use personal information to protect the copyright, trademarks, legal rights, property or safety of the Fund.

By providing the Fund with personal information, an individual consents to the terms of this Policy and the types of disclosure covered by this Policy. Where the Fund discloses personal information to third parties, the Fund will require that the third party follow this Policy regarding the handling of personal information.

## 3 Security of Personal Information

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The Fund is committed to ensuring that the information provided to the Fund is secure.

In order to prevent unauthorised access or disclosure, the Fund has put in place suitable physical, electronic and managerial procedures to safeguard and secure information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

The transmission and exchange of information to the Fund is carried out at the individual's own risk. The Fund cannot guarantee the security of any information that is transmitted to the Fund, or received from the Fund.

## 4 Retention of Personal Information

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The Fund will retain Personal Information only for as long as it is reasonably required for the purposes for which it was collected or otherwise used or disclosed, and for any longer period required or permitted by law, court / tribunal order, or reasonably necessary for governance, audit, insurance or dispute resolution purposes.

The Fund will take reasonable steps to destroy or de-identify Personal Information (including Sensitive Information) where:



- a) it is no longer needed for any purpose for which it may be used or disclosed in accordance with relevant privacy laws; and
- b) it is not required to be retained by or under an Australian law, or a court / tribunal order.

In the case of Sensitive Information, the Fund will take care to ensure secure destruction or de-identification in accordance with applicable privacy and health records legislation, including the Privacy Act 1988 (Cth) and the Health Records and Information Privacy Act 2002 (NSW).

## 5 Accessing, correcting and updating Personal Information

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A person may:

- a) enquire whether the Fund holds Personal Information about them;
- b) request access to that information in a reasonable timeframe and without unreasonable charge; and
- c) enquire as to the purposes for which it is being held.

The Fund, on request by the person, will give the person access to the information. We reserve the right to refuse to provide the information that the Fund holds, in certain circumstances set out in the Privacy Act.

If an Individual believes that the Personal Information the Fund holds is inaccurate, incomplete, not up to date or misleading, the individual may request that the information be amended and we must take reasonable steps to correct the information.

If the Fund decides not to grant access to Personal Information or refuses to correct Personal Information, we will provide written reasons for this decision (except to the extent that it would be unreasonable to do so), the mechanisms available to lodge a complaint and any other matters that we may be legally required to provide under the Privacy Act.

## 6 Destruction or de-identification of Personal Information

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Upon a request by an individual, the Fund will consider whether it is appropriate to destroy or de-identify Personal Information held by the Fund about that individual.

The Fund will take reasonable steps to destroy or de-identify Personal Information where:

- a) the information is no longer required for the purposes for which it was collected or otherwise used or disclosed; and
- b) the Fund is not required to retain the information by or under an Australian law, or a court or tribunal order.

Please contact: [info@rfsbenevolentfund.org.au](mailto:info@rfsbenevolentfund.org.au) for any requests relating to destruction of Personal Information.



## 7 Concerns about Privacy

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Where there are any concerns about the Fund's privacy practices, details of those concerns should be sent to [info@rfsbenevolentfund.org.au](mailto:info@rfsbenevolentfund.org.au).

The Fund will take all privacy concerns seriously and will respond within a reasonable timeframe after receiving written notice of the complaint.

## 8 Changes to the Privacy Policy

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This Privacy Policy will be reviewed and/or updated from time to time and at least every 2 years. Changes will be notified by posting the updated Privacy Policy on the Fund's website, with the "last updated" date clearly displayed. All modifications will take effect from date of publication. Individuals are encouraged to visit the Fund's website periodically to check for changes to our Privacy Policy.

## 9 Website

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When the Fund's website (<https://rfsbenevolentfund.org.au/>) is visited, the Fund may collect certain information such as browser type, operating system and the website visited immediately before coming to the site.

This information is generally collected in an aggregated and non-identifiable form and is used by the Fund to analyse how people use the site and improve support and services.

## 10 Cookies

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The Fund may from time to time use cookies on the Fund's website to analyse website traffic and help the Fund provide a better website visitor experience. Cookies are very small files which a website uses to identify website visitors when they return to the site and to store details about the use of the site.

Cookies are not malicious programs that access or damage computers. Most web browsers automatically accept cookies, but individuals can choose to reject cookies by changing their browser settings. However, this may prevent visitors from taking full advantage of the Fund's website.

The Fund's website may from time to time contain links to other websites not owned or controlled by the Fund. These links are provided for convenience only and do not constitute sponsorship, endorsement or approval of those websites.

The Fund is not responsible for the privacy practices of other websites and encourages users, when leaving the Fund's website, to read the privacy statements of each website that collects Personal Information.

## 11 Policy Review

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This policy will be reviewed every two years or sooner if required due to legislative changes.

