

Privacy Policy

1. Introduction

Wunan Foundation Inc. (**Wunan**) (“we”, “our” and “us”) is bound by the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**). This **Privacy Policy (Policy)** explains how and why we collect, use, hold and disclose personal and sensitive information.

We are committed to ensuring full compliance with the Privacy Act and APPs, maintaining transparency and accountability in all data-handling practices.

This Policy applies to all subsidiary companies, social enterprises, and programs of Wunan.

2. Definitions

The Privacy Act provides the following definitions:

Personal Information: Information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether recorded in a material form or not.

Sensitive Information: Information or opinion about an individual’s racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information, genetic information, biometric information or templates.

3. Scope

This Policy applies to all personal and sensitive information collected, stored, processed, and shared by us, whether in electronic or physical form. It covers all aspects of data management, including:

- The collection, use, disclosure, and storage of personal information;
- The rights of individuals regarding their personal data;
- The security measures in place to protect information; and
- The procedures for handling data breaches and complaints.

For **Wunan Health**, this Policy should be read alongside other policies and procedures. Given the highly sensitive nature of the information collected, additional privacy and security requirements may apply. Refer to *Wunan Health’s Privacy Policies* for information.

As required, Privacy information at Wunan Health is made available to patients and is visible in the waiting room.

4. How does Wunan collect your personal information?

We may collect your personal information directly from you whenever you interact with us. Some of the situations where we collect personal information include when you:

- Use our website;

- Sign up to our mailing list/s;
- Engage with us on social media;
- Participate in a program run by us;
- Contact us with a query, complaint or other feedback;
- Apply for employment with us;
- Are employed, seconded or contracted by us;
- Are appointed as a director;
- Volunteer for us;
- RSVP and/or attend an event held by us;
- Contract us to perform a service or deliver a product (through Wunan or any of its social enterprises);
- Partner or collaborate with us in respect of a program;
- Enter into an auspice arrangement with us;
- Donate to us;
- Supply or product or deliver services to us.

We may also collect information from third parties such as when you use an external booking system for one of our products (e.g. at Lily Lagoon Resort).

You can choose to deal with us without giving us any of your personal information, but if you do so we might not be able to provide you with the assistance that you need.

5. What personal information does Wunan collect?

Wunan may collect the following types of personal information:

- Names, addresses and phone numbers;
- Ages or dates of birth;
- Email addresses;
- Bank account details;
- Signatures;
- Employment details;
- Details of programs/services a person participated in;
- Health records;
- Education records;
- Ethnicity;
- Identification documents, including drivers license;
- Police Clearances and Working with Children Checks;
- Photographs.

6. Why does Wunan collect personal information?

Wunan collects, holds and uses your personal information so that we can:

- Delivery services or products to you.
- Undertake activities to pursue our mission and **Strategic Plan**;
- Contact you, for example, to respond to your queries or complaints, or if we need to tell you something important;
- Manage donor and supporter lists;
- Comply with our legal record keeping obligations;

- Co-ordinate and manage volunteers;
- Send newsletters or updates;
- Account for activities or expenses; and
- Provide supporting evidence when seeking grants or other funding.

If you do not provide us with your personal information, we may not be able to provide you with our services, communicate with you or respond to your enquiries.

7. How does Wunan store and hold personal information?

We store most information about you in computer systems and databases operated by either us or our external service providers. Some information about you is recorded in paper files that we store securely.

We implement and maintain processes and security measures to protect personal information which we hold from misuse, interference or loss, and from unauthorised access, modification or disclosure.

These processes and systems include:

- The use of identity and access management technologies to control access to systems on which information is processed and stored;
- Requiring all employees to comply with internal information security policies and keep information secure;
- Requiring all employees to complete training about information security; and
- Monitoring and regularly reviewing our practise against our own policies and against industry best practice.

8. Who do we disclose your personal information to, and why?

We may transfer or disclose your personal information to our related companies.

We may disclose personal information to external service providers so that they may perform services for us or on our behalf.

We may also disclose your personal information to others where:

- We are required or authorised by law to do so;
- You may have expressly consented to the disclosure, or the consent may be reasonably inferred from the circumstances; or
- We are otherwise permitted to disclose the information under the Privacy Act.

9. Our website privacy practices

Wunan operates a number of websites.

We sometimes use cookie technology on our websites to enable us to provide information and services to website visitors. Cookies are pieces of information that a website transfers to your computer's hard disk for record keeping purposes and are a necessary part of facilitating online transactions. Most web browsers are set to accept cookies. The website uses cookies to make your use of our website and services as enjoyable as possible. Cookies in and of themselves do not personally identify users, although they do identify a user's browser. Cookies are useful to estimate our number of members and determine overall traffic patterns through our website, as well as responding to your requests for particular services.

If you do not wish to receive any cookies you may set your browser to refuse cookies. This may mean you will not be able to take full advantage of the website services.

10. Cultural Safety

Materials published by Wunan, including websites, publications, artwork, photographs, social media and other communications, may contain images, voices, artwork, cultural expressions, or names of deceased persons. Wunan acknowledges and respects the cultural and intellectual property rights of Aboriginal and Torres Strait Islander artists and will endeavour to appropriately recognise and attribute artwork where practicable.

Wunan aims to provide culturally respectful warnings where practicable and encourages individuals to contact us if they have concerns regarding cultural content.

11. Access to and correction of your personal information

You may access or request correction of the personal information that we hold about you by contacting us. Our contact details are set out below. There are some circumstances in which we are not required to give you access to your personal information.

There is no charge for requesting access to your personal information, but we may require you to meet our reasonable costs in providing you with access (such as photocopying costs or costs for time spent on collating large amounts of material).

We will respond to your requests to access or correct personal information in a reasonable time and will take all reasonable steps to ensure that the personal information we hold about you remains accurate, up to date, complete, relevant and not misleading.

12. Complaints

If you have a complaint about the way in which we have handled any privacy issue, including your request for access or correction of your personal information, you should contact us. Our contact details are set out below.

We will consider your complaint and determine whether it requires further investigation. We will notify you of the outcome of this investigation and any subsequent internal investigation.

If you remain unsatisfied with the way in which we have handled a privacy issue, you may approach an independent advisor or contact the Office of the Australian Information Commissioner (OAIC) (www.oaic.gov.au) for guidance on alternative courses of action which may be available.

13. Contact details

If you have any questions, comments, requests or concerns, please contact us at:

Email: privacy@wunan.org.au

Mail: Attn: Privacy Officer

Wunan, PO Box 1338, Kununurra, WA 6743

14. Changes to this Policy

From time to time, we may change our policy on how we handle personal information or the types of personal information which we hold. Any changes to our policy will be published on our website.

You may obtain a copy of our current policy from our website or by contacting us at the contact details above.

15. Privacy by Design

Wunan has adopted the principle of privacy by design and will ensure that the definition and planning of all new or significantly changed systems that collect, or process personal data will be subject to due consideration of privacy issues.

16. Breach Notification

It is Wunan's policy to be fair and proportionate when considering the actions to be taken to inform affected parties regarding breaches of personal data. In line with the Privacy Act, where a breach is known to have occurred which is likely to result in serious harm to individuals, The Office of the Australian Information Commissioner (OAIC) and affected individuals will be informed promptly by the appropriate General Manager or the CEO.

17. Document Control

Version	Status	Issue Date	Change Description	Reviewer	Approver
02	Published	02/07/2026	Updated by ALE Legal	EMT	FRAC Committee