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**Policy Title** PRIVACY POLICY

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## 1. Introduction – Privacy Policy

Financial Counselling Victoria (“FCVic”) is committed to protecting the privacy of its members and other individuals it interacts with. As such, FCVic operates within the spirit and intent of the Victorian *Privacy and Data Protection Act 2014*, and the ten Information Privacy Principles (“IPP”) set out in the Act.

## 2. Scope

This Policy describes how FCVic manages the collection and maintenance of Personal and Sensitive Information to ensure privacy is respected and protected in accordance with relevant legislation. The Policy applies to all members, potential members, stakeholders, and employees of FCVic and covers all information collected and/or disseminated as part of FCVic activities.

## 3. Definitions

**Personal Information** is information or an opinion, whether true or not, that is recorded in any form, about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion. Examples of Personal Information we collect include: names, addresses, email addresses, phone numbers, education & employment history, and usernames & passwords.

**Primary Purpose** is the main reasons the Personal Information was shared with or collected by FCVic. FCVic only collects information where it is necessary to the Purposes and Objectives of the Association, as outlined in the Constitution. For example, processing of application for membership with FCVic.

**Reasonable Secondary Purpose** refers to use or collection of Personal Information that is directly related to the Primary Purpose, and consistent with what an individual would reasonably expect. An example of this is a member mailing list shared for the purposes of organising meetings of a specific member group.

**Sensitive Information** is defined in the *Privacy 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.

## 4. Policy

### 4.1 Collection of Personal Information

FCVic only collects information from members, potential members, stakeholders and/or employees where it is specific to the purposes and objectives of the Association, or for a Reasonable Secondary Purpose.

When we collect Personal Information we will, where appropriate and where possible, explain to the individual why we are collecting the information and how we plan to use it.

Reasons for collection include:

- Verifying an individual's identity.
- Processing an FCVic membership application or renewal.
- Registering and/or recording attendance for an event/workshop.

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- Sending information regarding FCVic advocacy and related activities, such as upcoming events, forums or training activities.
  - Improving our services, for instance via the collection of feedback or evaluation surveys.

**Please Note:**

FCVic does not store any payment information provided for the purposes of paying membership fees.

Individuals will be informed of the consequences to them if they don't provide their personal information to FCVic, which may include inability to process an application for membership or renewal.

#### 4.2 Sensitive Information

Sensitive information will be used by FCVic only:

- For the Primary Purpose for which it was obtained.
- For a Secondary Purpose that is directly related to the Primary Purpose.
- With consent of the individual; or where required or authorised by law.

#### 4.3 Third Parties

Where reasonable and practicable to do so, FCVic will only collect Personal Information directly from an individual. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that the individual concerned is made aware of the information provided to us by the third party.

Examples of third parties FCVic may interact with include:

- Financial counselling agencies.
- Interstate or national financial counselling bodies.
- Funding bodies.
- Registered Training Organisations.
- Third party mailing clients, such as MailChimp.

#### 4.4 Disclosure of Personal Information

An individual's Personal Information may be disclosed in a number of circumstances including the following:

- Within the FCVic governance and member structures, such as the Board, sub-committees, networks and working groups.
- Third parties, where the individual has consented to the use or disclosure; and
- Where required or authorised by law.

#### 4.5 Security of Personal Information

FCVic takes all reasonable steps to protect the personal and sensitive information it stores.

Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure.

When an individual's Personal Information is no longer needed for the purpose for which it was obtained, FCVic will take reasonable steps to destroy or permanently de-identify your Personal Information.

FCVic will maintain a Register of Members which includes their names, addresses, membership category, and the date on which they became a Member. For each former Member, only the Member's name and the date of ceasing to be a Member will be kept on the Register.

#### 4.6 Member access to Personal Information

Members and/or potential members of FCVic may access the Personal Information we hold about them, and update and/or correct it.

Personal Information can be accessed through a password-secured area of the FCVic website, or by writing to FCVic.

#### 4.7 Maintaining the Quality of Personal Information

It is important to FCVic that all individuals' Personal Information is up to date. We will take reasonable steps to make sure that Personal Information is accurate, complete and up-to-date. Where there is reason to believe that the information we have is not up to date or is inaccurate, individuals are encouraged to advise FCVic as soon as practicable, using the contact details provided in the "Privacy Concerns" section below, so that we can update our records and ensure we can continue to provide quality services.

#### 4.8 Mailing list subscription and opt-out

FCVic operates a number of opt-in mailing lists for the purposes of disseminating newsletters.

Individuals who have opted-in to an FCVic newsletter mailing lists can opt-out of receiving email newsletters from us at any time by clicking the "unsubscribe" link at the bottom of the newsletter. An opt-out request can also be made by emailing FCVic using the contact details provided in the "Privacy Concerns" section below.

Some communications (such as service messages, membership and registration notifications, billing information) are considered transactional and necessary for membership purposes. Members and potential members cannot opt out of these messages.

#### 4.9 Privacy Concerns

Queries or complaints relating to privacy matters at FCVic should be directed to: [admin@fcvic.org.au](mailto:admin@fcvic.org.au).

## 5. Relevant Documents

Victorian *Privacy and Data Protection Act 2014*  
FCVic Constitution

## 6. Implementation

The Communications Manager for FCVic is responsible for the implementation and management of this policy.

This Policy is to be reviewed annually to ensure compliance with current privacy legislation.

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## 7. Approved

Approved by FCVic EO.

### Contact Person:

For questions about this policy, contact the FCVic Systems and Operations Manager.

James Degenhardt

Email: [jdegenhardt@frc.org.au](mailto:jdegenhardt@frc.org.au)

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**RATIFIED:** 21 October 2020

**REVIEW:** Biennial

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Version History				
Version Number	Issue Date	Nature of Amendment	Developed by	Approved By
1	21/10/2020	New Document	James Degenhardt	FCVic EO
2	18/01/2022	Reviewed	James Degenhardt	FCVic EO