

WAFA PRIVACY POLICY

The purpose of this document is to set out the policies of the Western Australian Forest Alliance Inc. - ABN: 14803566986 (WAFA) in relation to the collection, holding, use and disclosure by WAFA of personal information relating to an individual as required by the Privacy Act 1988 (Cth) (Act).

For these purposes, "personal information" means information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

The types of personal information that WAFA collects includes personal information regarding WAFA members, WAFA supporters, WAFA volunteers, WAFA donors, WAFA personnel or other persons with whom WAFA or a third party has contact in connection with WAFA's activities.

1. Collection

- 1.1. WAFA collects personal information about individuals where that information is necessary for any of the following **primary purposes**:
 - 1.1.1. fulfilling WAFA's role in informing and educating the community about issues of protection of the natural environment;
 - 1.1.2. assisting WAFA and like-minded organisations (including WAFA Member Groups) to participate in relevant civic and political discussions, and assisting WAFA supporters in also doing so;
 - 1.1.3. notifying individuals of WAFA's activities and campaigns and inviting participation in initiatives;
 - 1.1.4. forging alliances, and supporting like-minded organisations (including WAFA Member Groups) to achieve our primary purpose, including by sharing information with them;
 - 1.1.5. seeking new members, supporters and donors, including through marketing activities, and processing, renewing and maintaining WAFA memberships and subscription services, including the use of third parties;
 - 1.1.6. increasing WAFA's financial support, through various fundraising activities, in order to maintain and enhance WAFA's campaigning capacity;
 - 1.1.7. (1.1.5) & (1.1.6) above include building a comprehensive understanding of individual interests and habits to enable effective engagement with members, supporters, donors and future supporters and donors;
 - 1.1.8. recruiting staff, committeemembers and volunteers;
 - 1.1.9. receiving feedback or complaints on any of the above functions or activities;
 - 1.1.10. responding to an individual's comments or questions and receiving feedback or complaints on any of the above functions or activities;
 - 1.1.11. to comply with WAFA's obligations under an Australian law including, but not limited to, Australian electoral law;
 - 1.1.12. improving our website; and
 - 1.1.13. such other purposes identified at the time of collecting your information.
- 1.2. WAFA will only collect personal information (other than sensitive information) when the information is reasonably necessary for one of more of WAFA's functions or activities set out in paragraph 1.1.

- 1.3. WAFA will only collect personal information by lawful and fair means.
- 1.4. At or before the time WAFA collects personal information about an individual from an individual, or as soon as practicable after, WAFA will take such steps as are reasonable to ensure that the individual is aware of:
 - 1.4.1. the identity of WAFA and how to contact WAFA;
 - 1.4.2. the fact that they are able to gain access to and seek correction of the information;
 - 1.4.3. the purposes for which the information is collected;
 - 1.4.4. organisations (or the types of organisations) to which WAFA usually discloses information of the kind collected, and if practicable the countries in which any overseas recipients are located;
 - 1.4.5. if the collection of the information is required or authorised by or under any Australian law or a court/tribunal order - the fact that collection is so required and relevant details of that requirement; and
 - 1.4.6. the main consequences (if any) for the individual if all or part of the information is not provided.
- 1.5. If it is reasonable and practicable to do so, WAFA will collect personal information about an individual only from that individual. WAFA may, from time to time, also collect personal information from publicly available sources (including via social media) or from third parties (for example, WAFA Community Groups, other NGOs, data companies, petition and social change platforms) and, unless the individual notifies us otherwise, the individual consents to their personal information being collected, used and disclosed as set out in this Privacy Policy. If WAFA collects personal information about an individual from someone else, or the personal information is unsolicited, it will take reasonable steps to ensure that the individual is or has been made aware that the information has been collected, the information and the circumstances of the collection.
- 1.6. WAFA uses web analytics to track visits to its website and uses this information to track the effectiveness of its website, like visits, length of visit, viewed pages and the technical configuration of the visitor's device. While this data is mostly anonymous, sometimes WAFA will connect it to an individual, for instance in personalising a webpage, or prefilling a form with the individual's details. WAFA also uses tools that tells it when a computer or device has visited or accessed its content and allows WAFA to tailor communications both through its website and paid communications networks based on the individual's visits or behaviour through cookies on the individual's device. An individual may control how cookies are used and for what through the settings on their chosen browser.
- 1.7. WAFA will determine within a reasonable period of time whether personal information about an individual which was collected from someone else or personal information which was unsolicited could not have been lawfully collected by the WAFA, and:
 - 1.7.1. if so, the information will be dealt with in accordance with this Privacy Policy; or
 - 1.7.2. if not, and the information is not contained in a Commonwealth record, WAFA will, as soon as practicable but only if lawful and reasonable to do so, destroy the information or ensure that the information is de-identified.
- 1.8. WAFA will not collect sensitive information about an individual, including information about that 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 preferences or practices, or criminal record unless:

- 1.8.1. the individual has consented to the collection of that information and the information is reasonably necessary for one or more of WAFA's functions or activities; or
- 1.8.2. the collection of the information is required or authorised by or under an Australian law or a court/tribunal order; or
- 1.8.3. a "permitted general situation" (as defined in subsection 16A of the Act) exists in relation to the use or disclosure of the information, including:
 - 1.8.3.1. where it is unreasonable or impracticable to obtain consent and WAFA reasonably believes that the use or disclosure is necessary to lessen or prevent a serious threat to the life, health or safety of an individual or to public health or safety; or
 - 1.8.3.2. WAFA has reason to suspect an unlawful activity or misconduct of a serious nature that relates to WAFA's functions or activities has been or may be engaged in and reasonably believes the use or disclosure is necessary in order for WAFA to take appropriate action; or
 - 1.8.3.3. WAFA reasonably believes that the use or disclosure is reasonably necessary to assist anyone to locate a person reported as missing and the use or disclosure complies with any rules made under s16(A)(2) of the Act; or
 - 1.8.3.4. the use or disclosure is reasonably necessary for the establishment, exercise or defence of a legal or equitable claim or a confidential alternative dispute resolution process; or
 - 1.8.3.5. the information relates to the activities of WAFA and the information relates solely to the members of WAFA, or to individuals who have regular contact with WAFA in connection with its activities.

2. Use and disclosure

- 2.1. WAFA may sometimes use or disclose personal information about an individual for a purpose (the secondary purpose) other than the primary purpose. However, WAFA will only use or disclose personal information about an individual for a secondary purpose in limited circumstances.
- 2.2. WAFA may use personal information about an individual for a secondary purpose if:
 - 2.2.1. the individual has consented to the use or disclosure; or
 - 2.2.2. the individual would reasonably expect WAFA to use or disclose the information for the secondary purpose and the secondary purpose is:
 - 2.2.2.1. if the information is sensitive information — directly related to the primary purpose; or
 - 2.2.2.2. if the information is not sensitive information — related to the primary purpose; or
 - 2.2.3. the use or disclosure of the information is required or authorised by or under an Australian law or a court/tribunal order; or
 - 2.2.4. a "permitted general situation" (as defined in subsection 16A of the Act) exists in relation to the use or disclosure of the information, including:
 - 2.2.4.1. where it is unreasonable or impracticable to obtain consent and WAFA reasonably believes that the use or disclosure is necessary to lessen or prevent a serious threat to the life, health or safety of an individual or to public health or safety; or
 - 2.2.4.2. WAFA has reason to suspect an unlawful activity or misconduct of a serious nature that relates to WAFA's functions or activities has been or may be engaged in and reasonably believes the use or disclosure is necessary in order for WAFA to take appropriate action; or

- 2.2.4.3. WAFA reasonably believes that the use or disclosure is reasonably necessary to assist anyone to locate a person reported as missing and the use or disclosure complies with any rules made under s16(A)(2) of the Act; or
 - 2.2.4.4. the use or disclosure is reasonably necessary for the establishment, exercise or defence of a legal or equitable claim or a confidential process; or
- 2.2.5. WAFA reasonably believes that the use or disclosure of the information is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body (and will make a written note about such use).
- 2.3. In this Policy **consent** means voluntary and informed agreement to some act, practice or purpose. WAFA will, wherever possible, seek consent from individuals before using their personal information for a secondary purpose. Where WAFA deems that a child or young person is unable to give sufficient consent to the use of his or her personal information for a particular purpose, WAFA will seek such consent from his or her parent or guardian.
- 2.4. WAFA may use personal information about an individual for the secondary purpose of promoting WAFA products, marketing of products or services of third parties with whom WAFA has an association, activities, materials, educational resources and competitions to the individual and to inform the individual of issues of protection of the natural environment generally (**direct marketing**).
- 2.5. WAFA may use personal information (other than sensitive information) about an individual for direct marketing if:
 - 2.5.1. WAFA collected the information from:
 - 2.5.1.1. The individual and the individual would reasonably expect WAFA to use or disclose the information for that purpose; and
 - 2.5.1.2. WAFA has provided a simple means by which the individual may easily request not to receive direct marketing communications from WAFA; and
 - 2.5.1.3. the individual has not made a request to WAFA to not receive direct marketing communications from WAFA; or
 - 2.5.2. WAFA collected the information from someone other than the individual and:
 - 2.5.2.1. it is impracticable to obtain the individual's consent; and
 - 2.5.2.2. the individual would not reasonably expect that use; and
 - 2.5.2.3. in each direct marketing communication with the individual WAFA includes a prominent statement that the individual may make such a request; or
 - 2.5.2.4. WAFA otherwise draws the individual's attention to the fact that the individual may make such a request; and
 - 2.5.2.5. the individual has not made a request to WAFA to not receive direct marketing communications from WAFA.
- 2.6. WAFA may only use or disclose sensitive information about an individual for the purpose of direct marketing if the individual has consented to the use or disclosure of the information for that purpose.
- 2.7. WAFA may use or disclose personal or sensitive information for the testing of WAFA security systems and database performance.
- 2.8. WAFA may disclose personal information to companies who provide services on WAFA's behalf, such as fundraising, mail, database, telephone, digital services, audit, professional advice, payment processing and research services. WAFA may also disclose personal information to its volunteers who assist with many of its activities. WAFA may also disclose personal information to like-minded organisations, including WAFA Member Groups, that also

wish to achieve protection of the natural environment outcomes or that we work with in alliances from time to time. WAFA will put in place arrangements with these third parties that imposes a legal obligation on them to preserve the confidentiality of the personal information disclosed to them.

2.9. If WAFA uses or discloses personal information about an individual for:

- 2.9.1. direct marketing, an individual may request not to receive direct marketing communications from WAFA and WAFA must give effect to the request within a reasonable period of time; or
- 2.9.2. the purposes of facilitating direct marketing by other organisations, an individual may request WAFA not to use or disclose the individual's information for the purpose of facilitating direct marketing by other organisations and WAFA must give effect to the request within a reasonable period of time,
- 2.9.3. and the individual may request WAFA to be provided with the source of the information and WAFA must within a reasonable period of time after the request was made, provide details of the source unless it is impractical or unreasonable to do so.

2.10. WAFA will not charge any individual for the making of, or to give effect to, such requests.

3. Data quality

3.1. WAFA will take such steps as are reasonable in the circumstances to ensure that the personal information it collects is accurate, complete and up-to-date and, having regard to the purposes of the use or disclosure of the personal information that is collected, relevant.

4. Data security

- 4.1. WAFA will take such steps as are reasonable in the circumstances to protect the personal information it holds from misuse, interference (which may include measures to protect against computer attacks) and loss and from unauthorised access, modification or disclosure.
- 4.2. WAFA will take such steps as are reasonable in the circumstances to destroy or permanently de-identify personal information about an individual that it holds if it is no longer needed for any purpose for which the information may be used or disclosed, and is not required to be retained by law or a court/tribunal order.

5. Open and transparent management

- 5.1. WAFA has set out in this document, in an open and transparent way, its policies on the management of personal information. WAFA will make this document publicly available on its website at www.wafa.org.au and will take reasonable steps to provide a copy of this Policy, free of charge, to anyone who asks for it (see section 12 of this Policy for contact details).
- 5.2. On request by a person, WAFA will take reasonable steps to let the person know, generally, what sort of personal information WAFA holds in relation to that person, for what purposes, and how it collects, holds, uses and discloses that information.

6. Access and correction

- 6.1. If WAFA holds personal information about an individual, WAFA will provide the individual with access to the information on request by the individual unless any of the following exceptions apply:
 - 6.1.1. WAFA reasonably believes that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety; or
 - 6.1.2. giving access would have an unreasonable impact upon the privacy of other individuals; or
 - 6.1.3. the request for access is frivolous or vexatious; or

- 6.1.4. the information relates to existing or anticipated legal proceedings between WAFA and the individual, and the information would not be accessible by the process of discovery in those proceedings; or
 - 6.1.5. providing access would reveal the intentions of WAFA in relation to negotiations with the individual in such a way as to prejudice those negotiations; or
 - 6.1.6. providing access would be unlawful; or
 - 6.1.7. denying access is required or authorised by or under an Australian law or a court/tribunal order; or
 - 6.1.8. both of the following apply:
 - 6.1.8.1. WAFA has reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to WAFA functions or activities has been or is being or may be engaged in; and
 - 6.1.8.2. giving access would be likely to prejudice the taking of appropriate action in relation to the matter; or
 - 6.1.9. providing access would be likely to prejudice one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
 - 6.1.10. giving access would reveal evaluative information generated within WAFA in connection with a commercially sensitive decision-making process.
- 6.2. WAFA will respond to an access request within a reasonable period after the request is made and will give access to the personal information in the manner requested by the individual, if it is reasonable and practicable to do so. WAFA may, in appropriate circumstances, charge the individual for giving access to the personal information. Such a charge will not be excessive.
- 6.3. If WAFA refuses to give access to personal information in the manner requested by the individual or because one or more of the exceptions apply WAFA will take such steps as are reasonable in the circumstances to give access in a way that meets the needs of WAFA and the individual.
- 6.4. If WAFA refuses to give access to personal information in the manner requested by the individual or because one or more of the exceptions referred to in paragraph 6.1 of this Policy apply, WAFA will give the individual a written notice that sets out the reasons for the refusal, except to the extent that, having regard to the grounds of refusal it would be unreasonable to do so and the mechanisms available to complain about the refusal (and such other matters prescribed by the regulations). If the reason for refusal is the exception referred to in paragraph (6.1.10) of this Policy, the reasons for refusal may include an explanation for the commercially sensitive decision.
- 6.5. An individual can request WAFA to correct personal information held by WAFA. WAFA will respond to the request within a reasonable period of time after the request is made and will take such steps as are reasonable in the circumstances to correct the information to ensure that, having regard to the purpose for which it is held, it is accurate, up to date, complete, relevant and not misleading. WAFA may also take such steps on its own initiative, if WAFA is satisfied, having regard to the purpose for which personal information about an individual is held, it is inaccurate, out of date, incomplete, irrelevant or misleading.
- 6.6. If WAFA refuses to correct the personal information as requested by the individual, WAFA will give the individual a written notice that sets out the reasons for the refusal, except to the extent that, having regard to the grounds of refusal it would be unreasonable to do so, and the mechanisms available to complain about the refusal (and such other matters prescribed by

the regulations).

- 6.7. An individual can request WAFA to notify another Australian Privacy Principles entity to whom WAFA has previously disclosed personal information about the individual, of corrections made to their personal information. WAFA will take such steps as are reasonable in the circumstances to give that notification unless it is impracticable or unlawful to do so.
- 6.8. An individual can request WAFA to associate with the information a statement that the information is inaccurate, out of date, incomplete, irrelevant or misleading. WAFA will respond to a request within a reasonable period after the request is made and will take such steps as are reasonable in the circumstances to associate the statement in such a way that will make the statement apparent to the users of the information.

7. Government Related Identifiers

- 7.1. WAFA will not adopt a government related identifier of an individual as its own identifier of the individual unless:
 - 7.1.1. the adoption of the government related identifier is required or authorised by law or a court/tribunal order; or
 - 7.1.2. WAFA is a prescribed organisation, the identifier is prescribed and the adoption, use or disclosure occurs in prescribed circumstances.
- 7.2. WAFA will not use or disclose a government related identifier of an individual unless:
 - 7.2.1. the use or disclosure of the identifier is reasonably necessary for WAFA to verify the identity of the individual for the purposes of the WAFA's activities or functions; or
 - 7.2.2. the use or disclosure of the identifier is reasonably necessary for WAFA to fulfil its obligations to an agency or a State or Territory authority; or
 - 7.2.3. the use or disclosure of the identifier is required or authorised by or under an Australian law or a court/tribunal order; or
 - 7.2.4. a "permitted general situation" as defined in subsection 16A of the Act exists (excluding items 4 & 5) in relation to the use or disclosure of the identifier, including:
 - 7.2.4.1. where it is unreasonable or impracticable to obtain consent and WAFA reasonably believes that the use or disclosure is necessary to lessen or prevent a serious threat to the life, health or safety of an individual or to public health or safety; or
 - 7.2.4.2. WAFA has reason to suspect an unlawful activity or misconduct of a serious nature that relates to WAFA's functions or activities has been or may be engaged in and reasonably believes the use or disclosure is necessary in order for WAFA to take appropriate action; or
 - 7.2.4.3. WAFA reasonably believes that the use or disclosure is reasonably necessary to assist anyone to locate a person reported as missing and the use or disclosure complies with any rules made under s16(A)(2) of the Act; or
 - 7.2.5. WAFA reasonably believes that the use or disclosure of the identifier is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
 - 7.2.6. subclause 7.1(b) applies in relation to the use or disclosure.
- 7.3. In this section 7 **identifier** includes a number assigned by WAFA to an individual to identify uniquely the individual for the purposes of WAFA's operations. However, an individual's name or ABN (as defined in the A New Tax System (Australian Business Number) Act 1999) is not

an identifier.

8. Anonymity and Pseudonymity

- 8.1. Wherever it is not unlawful or impracticable, individuals will have the option of not identifying themselves, or of using a pseudonym, when dealing with WAFA. The details of anonymous donors will not be disclosed publicly but a record is held by WAFA due to obligations under taxation, electoral and other laws.

9. Cross-border disclosure of personal information

- 9.1. WAFA may need to store or use personal information in a country other than Australia, usually because one of WAFA's technical systems is located or needs to process data overseas or because a service provider is located overseas.
- 9.2. As of the last update of this policy, the countries in which WAFA discloses and/or stores personal information may include:
- 9.2.1. United States
 - 9.2.2. Singapore
 - 9.2.3. European Union
 - 9.2.3.1. France
 - 9.2.3.2. Germany
 - 9.2.3.3. Netherlands
 - 9.2.3.4. Spain
 - 9.2.3.5. UK
- 9.3. WAFA will only disclose or store personal information overseas if WAFA has taken reasonable steps to ensure that the information will not be held, used or disclosed by the recipient of the information inconsistently with the Australian Privacy Principles, unless:
- 9.3.1. WAFA reasonably believes that the recipient of the information is subject to a law, binding scheme or contract which effectively upholds principles for fair handling of the information that are substantially similar to the Australian Privacy Principles and there are mechanisms an individual can access to enforce the protection of the law or binding scheme; or
 - 9.3.2. the individual consents to the transfer after having been informed that WAFA will not be required to take reasonable steps to ensure that the information, which it has transferred, will not be held, used or disclosed by the recipient of the information inconsistently with the Australian Privacy Principles; or
 - 9.3.3. the use or disclosure of the information is required or authorised by or under an Australian law or a court/tribunal order; or
 - 9.3.4. a "permitted general situation" as defined in subsection 16A of the Act) exists (excluding items 4 & 5) in relation to the use or disclosure of the information, including:
 - 9.3.4.1. where it is unreasonable or impracticable to obtain consent and WAFA reasonably believes that the use or disclosure is necessary to lessen or prevent a serious threat to the life, health or safety of an individual or to public health or safety; or
 - 9.3.4.2. WAFA has reason to suspect an unlawful activity or misconduct of a serious nature that relates to WAFA's functions or activities has been or may be engaged in and reasonably believes the use or disclosure is necessary in order for WAFA to take appropriate action; or

- 9.3.4.3. WAFA reasonably believes that the use or disclosure is reasonably necessary to assist anyone to locate a person reported as missing and the use or disclosure complies with any rules made under s16(A)(2) of the Act.

10. Complaints

- 10.1. WAFA will consider complaints made by an individual in relation to:
- 10.1.1. a decision to refuse access to personal information the individual requests; or
 - 10.1.2. a decision not to correct personal information; and
 - 10.1.3. will respond within a reasonable period after the complaint is received. The WAFA response to a complaint is final.
- 10.2. An individual may make a complaint about WAFA's handling of the individual's personal information to the Office Australian Information Commissioner (OAIC). Further information is available on the OAIC website: <http://www.oaic.gov.au/privacy/privacy-complaints>.

11. Notifiable data breaches scheme

- 11.1. In the event of any unauthorised access or disclosure of an individual's personal information (including where information is lost in circumstances where unauthorised access or disclosure is likely to occur) that is likely to result in serious harm to an individual, WAFA will investigate and notify the individual concerned and the Office of the Australian Information Commissioner as soon as practicable, in accordance with the Privacy Act.

12. Contact details

- 12.1. Queries or complaints regarding this Privacy Policy, or requests for access to, or correction of, personal information should be directed to the WAFA Communications Officer as follows:

WAFA Communications Officer
2 Delhi St
West Perth
WA, 6000, Australia
Email: forests@WAFA.org.au

13. Review

- 13.1. This Privacy Policy will be reviewed and updated as necessary.

This Policy was last updated March 2025