

Privacy Policy - Indigo

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1. Policy Statement

Indigo Australasia Incorporated (82 056 232 143) (collectively, Indigo, we, us or our) is a not-for-profit organisation that provides allied health, home modifications and assistive technology (AT) solutions to disability and aged care clients and their carers/supporters, health professionals and educators.

We are committed to protecting and upholding the right to privacy of clients, staff, volunteers, and contractors we deal with. In particular, to protecting and upholding our clients' rights in the way we collect, store and use personal information about them, their needs and preferences, and the care and services we provide to them.

Indigo is subject to the *Privacy Act 1988 (Cth)* and the *Australian Privacy Principles* which govern the collection, use and storage of personal information. This policy outlines how we meet our privacy obligations.

2. Scope

This policy applies to anyone who provides personal information to Indigo and anyone who has access to personal information we hold such as employees, volunteers, suppliers or contractors. It applies to all records, whether hard copy or electronic that contain personal information. All staff have access to and have acknowledged understanding of this Policy.

3. Principles

3.1. Collection of Information

Indigo collects personal information relevant to the provision of our services, support, quality assurance, record keeping and accounts purposes, continuous improvement, complaints and incident management and to inform you of products and services in which you may be interested. At collection, or as soon as is reasonably practicable, clients will be advised what information we are collecting, how their privacy will be protected and their rights in relation to this information. Collection may be over the phone, in person or via a hard copy or electronic form.

Wherever possible Indigo will collect your personal information directly from you. Sometimes it may be necessary for us to collect your personal information from a third party who is legally permitted to disclose it to us (for example, your carer, family member, allied health professional or general practitioner). If this occurs, we will take reasonable steps to make sure you are aware of the purpose for which the information was obtained and how it will be used and disclosed. Other care providers may also share your personal information with us when they refer you to us for service.

The types of personal and sensitive information we may collect includes, but is not limited to:

Clients and Prospective Clients

- contact details (name, address, email, phone);
- demographic information (date of birth, citizenship, residency and visa information);

- name and contact details of any supporter's, clients may nominate, involved in their care; and
- bank account information.

Types of sensitive information that may be collected include;

- ethnicity (including Aboriginal and Torres Strait Islander status);
- cultural preferences; and
- religion.

Employees, Volunteers and Job Applicants

- contact details (name, address, email, phone);
- demographic information (date of birth, citizenship, country of birth, residency, visa details);
- emergency contact information;
- qualifications, experience, driver's license;
- bank account information;
- Working with Children Check, Police Clearance and/or NDIS Worker Screening Check; and
- health information.

3.2. Health Information

Indigo may sometimes need to collect your health information. This could include your medical history, including information or opinion about your illness, injury or disability, care plans, medications and information about healthcare professionals involved in your care.

3.3. Consent

Wherever possible, Indigo must gain consent from clients to collect, store, use and disclose their information prior to recording it and details of the consent provided are recorded against the individual client's file in the respective database. Consent may be given in writing, digitally or verbally and consent as noted in this policy means either express or implied consent. That is consent that is given explicitly, or consent which can be reasonably inferred in the circumstances from the interactions between the organisation and the individual.

In certain circumstances Indigo may not be able to obtain consent before collecting personal information. These circumstances may involve clients not being able to communicate consent to us for reasons which may include age, cognitive impairment, or other illnesses. In these circumstances, Indigo may be limited in how it can collect, use, and disclose personal information. Indigo will only do so in accordance with the Privacy Legislation. If clients are not able to provide consent, the Privacy Legislation allows us to obtain consent from a legal guardian or attorney or someone else who is entitled to act on their behalf. Similarly, if a client cannot give consent for any reason, the Privacy Legislation also allows Indigo to disclose personal information in limited circumstances if the disclosure is necessary to enable the provision of appropriate care or treatment.

3.4. Use and Disclosure of Personal Information

Indigo will only collect and use your information for the purpose of which it was collected. Indigo will take reasonable steps to keep your personal information confidential. Indigo employees will not disclose your personal information with a third party, without your consent unless required by law or Indigo believes that you or someone else will be harmed. Indigo does not store any client personal information overseas. Indigo's third-party Service Desk provider is located

overseas, in the United States of America, which may store employee personal information. All employee sensitive information is stored in Australia.

Indigo may disclose personal information with other parties including:

- health professionals involved in your care;
- government departments and agencies;
- suppliers who may deliver a product or service on our behalf;
- regulatory bodies;
- attorneys or guardians;
- referees;
- third-party providers to facilitate a service or function (online payment facilities);
- professional advisors, lawyers, accountants, insurers and auditors.

With your consent, Indigo may use your personal information to contact you regarding services or products that may be of interest to you. If you no longer want to receive these communications, call Indigo on (08 9381 0600) or email marketing@indigo.org.au.

3.5. Marketing

When you visit Indigo's website, cookies may be collected to track how you interact with our website. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. This includes information such as the pages you visit, the links you click, the date and time of your visit, your IP address, the type of browser, and the website that referred you, if applicable. In general, this information will only identify your device and will not identify you personally. This data helps us analyse website traffic, enhance security, and improve our services.

We advertise on Facebook and Google, as well as other online platforms, and place advertising on other websites to promote general awareness about Indigo products and services that we offer. We do this by:

- advertising on particular types of websites; and
- advertising to people signed up with a platform such as Facebook based on what the platform knows about them.

This means that if you have already visited our website, we can direct you back to it through ads shown on sites you visit across the internet by third party vendors. All parties may use cookies to show these ads based on your past visit to our website.

If you do not wish to accept cookies, you can manage or disable them through:

- installing the [Google Analytics Opt Out Browser Add-on](#)
- updating your [Facebook Ad Preferences Page](#)

It is possible to switch off cookies by setting your browser preferences, however, this may result in a loss of functionality when using our website.

3.6. Releasing Images or Personal Information for Publicity

Indigo publishes promotional material to raise awareness of our services and to provide information to the public. Some of the material may include photos, video recordings and sound recordings. Indigo will obtain consent before using any images or recordings of you.

3.7. Access to and Correction of Your Personal Information

Under the *Privacy Act 1988*, you have the right to access to and make changes to the personal information that Indigo holds. Requests should be made in writing to Indigo's Quality Team (details below). We will respond to your request within 10 business days after the request is received. Indigo will request proof of identity when any requests to access or change information are received.

Indigo does have the right under the Act to refuse requests to access or make changes to personal information. If this occurs, Indigo will advise you in writing explaining the reasons the request has been refused.

3.8. Security of Personal Information

Indigo stores your personal information in both electronic and physical paper form. We are committed to protecting your information from unauthorised access and/or use and take reasonable steps to protect it. Due to the nature of the internet, we cannot guarantee that electronic information stored is totally secure. Indigo takes reasonable steps to destroy or permanently de-identify your information which is no longer needed for the purpose of which it was collected and/or after legal requirements for retaining information has expired.

Indigo does not input personal or sensitive information into publicly available generative artificial intelligence (GenAI) tools. Usage of GenAI tools must be conducted in compliance with this policy, the *Privacy Act* and *Australian Privacy Principles* and the organisations *AI Usage Policy*.

3.9. How to Contact Us

If you have any questions about this policy or your personal information or require a copy of this policy in an alternate format, please contact us as per the below:

Email: quality@indigo.org.au

Mail: Indigo, The Niche, Suite A, 11 Aberdare Road, Nedlands WA 6009

Phone: 1300 885 886 or (08) 9381 0600

3.10. Complaints

If you have a complaint about the way we have collected, used or disclosed your personal information or a potential privacy breach you have the right to make a complaint. You can contact us using the details above. Indigo will investigate and respond to your complaint, usually within 30 days. If you are not satisfied with our handling of your complaint you are entitled to refer the matter to the Office of the Australian Information Commissioner via an online form, in a letter or fax. Full contact details can be found on their website www.oaic.gov.au

4. Changes to Privacy Policy

This policy may be amended, modified or replaced from time to time. The latest version will be published on our website.

5. Definitions

Health information	Health Information has the meaning provided in the <i>Privacy Act 1988 (Cth)</i> and includes: <ul style="list-style-type: none">• information or an opinion about the health or a disability of an individual;• an individual's expressed wishes about the future provision of health services to him or her;
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	<ul style="list-style-type: none"> • a health service provided, or to be provided, to an individual; and • other personal information collected to provide, or in providing a health service.
Personal information	Personal information has the meaning provided in the <i>Privacy Act 1988</i> (Cth) which is “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.” Personal information includes sensitive information and health information.
Privacy Principles	The Australian Privacy Principles set out in Schedule 1 of the <i>Privacy Act 1988</i> (Cth).
Sensitive information	Information or an 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 preferences or practices; or criminal record.

6. Governance

Associated documents	IDG-BRD-PRO-0106 Privacy Procedure
Related legislation	Privacy Act 1988 (Cth)
Division	Board
Approval	Board
Owner	Chief Executive Officer
Date created	August 2018
Next review date	01 April 2027
Version	5

For advice and support please contact the Quality Lead at Quality@indigo.org.au