



***BRISBANE SENIORS ONLINE DATA
PROTECTION POLICY***

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DATA PROTECTION POLICY

INTRODUCTION

Brisbane Seniors OnLine (BSOL) gathers and uses certain information about individuals.

These can include members, suppliers, business contacts, office staff, members of the management and other people the organisation has a relationship with or may need to contact.

This policy describes how this personal data is to be collected, handled and stored to meet BSOL's data protection standards — and to comply with the law.

WHY THIS POLICY EXISTS

This data protection policy ensures Brisbane Seniors OnLine:

- Complies with data protection law and follows good practice
- Protects the rights of staff, members and partners
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

DATA PROTECTION LAW

The Privacy Act 1988 describes how organisations — including Brisbane Seniors OnLine— must collect, handle and store personal information.

These rules apply regardless of whether data is stored electronically, on paper or on other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The Privacy Act 1988 is underpinned by seven important principles. These say that personal data must enable:

1. Open and transparent management of personal information including having a privacy policy
2. An individual to have the option of transacting anonymously or using a pseudonym where practicable
3. The collection of solicited personal information and receipt of unsolicited personal information including giving notice about collection
4. How personal information can be used and disclosed (including overseas)
5. Maintaining the quality of personal information
6. Keeping personal information secure
7. Right for individuals to access and correct their personal information

PEOPLE, RISKS AND RESPONSIBILITIES

POLICY SCOPE

This policy applies to:

- The head office of Brisbane Seniors OnLine
- All members and volunteers of Brisbane Seniors OnLine
- All contractors, suppliers and other people working on behalf of Brisbane Seniors OnLine

It applies to all data that BSOL holds relating to identifiable individuals, even if that information technically falls outside of the Privacy Act 1988. This can include:

- Names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- ...plus any other information relating to individuals

DATA PROTECTION RISKS

This policy helps to protect Brisbane Seniors OnLine from some very real data security risks, including:

- **Breaches of confidentiality.** For instance, information being given out inappropriately.
- **Failing to offer choice.** For instance, all individuals should be free to choose how BSOL uses data relating to them.
- **Reputational damage.** For instance, BSOL could suffer if hackers successfully gained access to sensitive data.

RESPONSIBILITIES

Everyone who works for or with Brisbane Seniors OnLine has some responsibility for ensuring data is collected, stored and handled appropriately.

Each member who handles personal data must ensure that it is handled and processed in line with this policy and data protection principles.

However, these people have key areas of responsibility:

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- The Management Committee is ultimately responsible for ensuring that Brisbane Seniors OnLine meets its legal obligations.
 - The ICT Manager, is responsible for:
 - Keeping the Management Committee updated about data protection responsibilities, risks and issues.
 - Reviewing all data protection procedures and related policies, in line with an agreed schedule.
 - Arranging data protection training and advice for the people covered by this policy.
 - Handling data protection questions from staff and anyone else covered by this policy.
 - Dealing with requests from individuals to access/view the data Brisbane Seniors OnLine holds about them (also called 'subject access requests').
 - Checking and approving any contracts or agreements with third parties that may handle BSOL's sensitive data.
 - Ensuring all systems, services and equipment used for storing data meet acceptable security standards.
 - Performing regular checks and scans to ensure security hardware and software is functioning properly.
 - Evaluating any third-party services BSOL is considering using to store or process data e.g. cloud computing services.
 - The Publicity Committee is responsible for:
 - Approving any data protection statements attached to communications such as emails and letters.
 - Addressing any data protection queries from journalists or media outlets.
 - Where necessary, working with other staff to ensure publicity initiatives abide by data protection principles.

GENERAL STAFF GUIDELINES

- The only members able to access data covered by this policy should be those who need it for their work.
- Data should not be shared informally. When access to confidential information is required, members can request it from the President or the ICT Manager.
- Brisbane Seniors OnLine will provide training to all members to help them understand their responsibilities when handling data.

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- Members should keep all data secure, by taking precautions and following the guidelines below.
 - In particular, strong passwords must be used and they should never be shared.
 - Personal data should not be disclosed to unauthorised people, either within BSOL or externally.
 - Data should be regularly reviewed and updated if it is found to be out of date. If no longer required, it should be deleted and disposed of.
 - Members should request help from the President or the ICT Manager if they are unsure about any aspect of data protection.

DATA STORAGE

These rules describe how and where data should be safely stored. Questions about storing data safely can be directed to the President or ICT manager.

When data is **stored on paper**, it should be kept in a secure place where unauthorised people cannot access/view it.

These guidelines also apply to data that is usually stored electronically but has been printed out for some reason:

- When not required, the paper or files should be kept **in a locked drawer or filing cabinet**.
- Members should make sure paper and printouts are **not left where unauthorised people could see them**, like on a printer.
- **Data printouts should be shredded** and disposed of securely when no longer required.
- Financial information **will be shredded** when it has been used and no longer required to process members' fees.

When data is **stored electronically**, it must be protected from unauthorised access, accidental deletion and malicious hacking attempts:

- Data should be **protected by strong passwords** that are changed regularly and never shared between Members.
- If data is **stored on removable media** (like a CD or DVD), these should be kept locked away securely when not being used.
- Data should only be stored on **designated drives and servers**, and should only be uploaded to an **approved cloud computing services**.
- Data should be **backed up frequently**. Those backups should be tested regularly, in line with BSOL's standard backup procedures.

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- Data should **never be saved directly** to laptops or other mobile devices like tablets or smart phones.
 - All servers and computers containing data should be protected by **approved security software and a firewall**.

DATA USE

Personal data is of no value to Brisbane Seniors OnLine unless the business can make use of it. However, it is when personal data is accessed and used that it can be at the greatest risk of loss, corruption or theft:

- When working with personal data, Members should ensure **the screens of their computers are always locked** when left unattended.
- Personal data **should not be shared informally**. In particular, it should only be sent by email when needed, as this form of communication is not fully secure. (it is sent in plain text and can be intercepted)

DATA ACCURACY

The law requires Brisbane Seniors OnLine to take reasonable steps to ensure data is kept accurate and up to date.

It is the responsibility of all Members who work with data to take reasonable steps to ensure it is kept as accurate and up to date as possible.

- Data will be held in **as few places as necessary**. Staff should not create any unnecessary additional data sets.
- Staff should **take every opportunity to ensure data is updated** e.g by confirming a member's details when they call.
- Brisbane Seniors OnLine will make it **easy for members to update the information Brisbane Seniors OnLine** holds about them eg via BSOL website.
- Data should be **updated as inaccuracies are discovered**. For instance, if a member can no longer be reached on their stored telephone number, it should be removed from the database.

SUBJECT ACCESS REQUESTS

All individuals who are the subject of personal data held by Brisbane Seniors OnLine are entitled to:

- Ask **what information** BSOL holds about them and why.

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- Ask **how to gain access** to it.
 - Be informed **how to keep it up to date**.
 - Be informed how BSOL is **meeting its data protection obligations**.

If an individual contacts BSOL requesting this information, this is called a subject access request.

Subject access requests from individuals should be made by email, addressed to the MIS manager at admin@bsol.asn.au. The MIS Manager can supply a standard request form, although individuals do not have to use this.

Individuals will not be charged for an access request. The MIS Manager will aim to provide the relevant data within 14 days.

The MIS Manager will always verify the identity of anyone making a subject access request before handing over any information.

DISCLOSING DATA FOR OTHER REASONS

In certain circumstances, the Privacy Act 1988 allows personal data to be disclosed to law enforcement agencies without the consent of the data subject.

Under these circumstances, Brisbane Seniors OnLine will disclose requested data. However, the MIS Manager will ensure the request is legitimate, seeking assistance from the Management Committee and from BSOL's legal advisers where necessary.

PROVIDING INFORMATION

Brisbane Seniors OnLine aims to ensure that individuals are aware that their data is being processed, and that they understand:

- How the data is being used
- How to exercise their rights

To these ends, BSOL has a privacy statement, setting out how data relating to individuals is used by BSOL.

[This is available on request. A version of this statement is also available on BSOL's website.]