



# Privacy Policy

*Legal & Governance - Policy*



**RSL**  
Queensland

## Contents

Introduction .....	3
Policy Statement .....	3
What personal information do we collect .....	3
How we collect and hold personal information .....	4
Website usage information and cookies .....	5
Collection and use of CCTV information .....	6
What we do with your personal information .....	6
Your payment information .....	7
Direct Marketing .....	8
Research Project Participation .....	8
Situations where we may disclose your personal information .....	9
Artificial Intelligence .....	9
Overseas disclosure .....	9
GDPR – processing European Union (EU) personal data .....	10
Security of data and information .....	11
Retention, Destruction and de-identification .....	11
Your consent .....	11
Pseudonymity or anonymity .....	12
Access to your personal information .....	12
Complaints and concerns .....	12
Changes to this Privacy Policy .....	12
Contact details .....	13
Related Documents .....	13
Need more info? .....	13

## Introduction

Returned and Services League of Australia (Queensland Branch) ABN 79 902 601 713 respects and upholds the privacy rights of individuals.

We are sensitive to privacy issues and take seriously the ongoing trust placed in us. We have committed to compliance with the Privacy Act 1988 (Cth) (Privacy Act), including the Australian Privacy Principles (APPs), which detail how personal information may be collected, used, disclosed, stored, and destroyed, and how an individual may gain access to or make complaints about the personal information held about them.

This document is our Privacy Policy and describes how we handle your personal information.

Personal information is information or an opinion about an identified individual, or about an individual who is reasonably identifiable.

Sensitive information, a sub-set of personal information, is information or an opinion about an individual's racial or ethnic origin, political opinions, political association membership, religious beliefs or affiliations, philosophical beliefs, professional or trade association membership, trade union membership, sexual orientation or practices, or criminal record, and includes health information and genetic information.

## Policy Statement

RSL Queensland is committed to information security and data privacy and will ensure that:

- We meet legal and ethical obligations as an employer and service provider in relation to protecting the privacy of clients, customers and employees.
- We provide information about the right to privacy to our clients and customers, which includes how we collect, use and disclose personal information in order to perform our function and activities in pursuit of the Objects of the League, which includes the provision of services to veterans and their families enabled by operation of the Dream Home Art-Union Lottery.
- Clients and employees are provided with privacy when they are being interviewed or discussing matters of a personal or sensitive nature.
- All staff and volunteers understand what is required in meeting these obligations.
- Data and information, including data received from third parties, is secured through various physical, electronic and procedural safeguards to protect personal information in our care.

More information about the Australian Privacy principles and Privacy rights and responsibilities can be found on the Office of the Australian Information Commissioner Website – [www.oaic.gov.au](http://www.oaic.gov.au)

## What personal information do we collect

We only collect personal and sensitive information that is necessary to deliver services in pursuit of the Objects of our League. A further breakdown of these can be found below in the, *what we do with your personal information* section.

The types of personal information we may collect depends on the purpose for which we need the information and may include but not limited to, the following:

- full name.
- your location including street and postal address (billing address if applicable).
- email address.
- telephone number.
- date of birth.
- occupation.
- service record.
- direct dependent information
- payment information, including details of your superannuation fund.
- RSL membership number.
- IP address, browser type, domain names, browsing preferences, access times and the addresses of referring websites.
- proof of identity information and documentation including driver's licence, passport, or birth certificate.
- proof of income documentation.
- next of kin and emergency contact information.
- images from CCTV used in our centres.

We may also collect sensitive information from you when we engage with you as part of providing our veteran counselling/psychology, rehabilitation and welfare support services including (but not limited to):

- mental health support.
- physical rehabilitation support.
- emergency financial assistance.
- bereavement assistance.
- help with compensation claims through the Department of Veterans' Affairs.
- referrals to peer support groups and other specialist services.
- visits to the sick, injured, and lonely in hospital and/or at their homes.
- short term crisis accommodation.
- subsidised longer-term housing solutions; or,
- where there is a legal requirement to do so, or where we are otherwise permitted by law.

The kinds of sensitive information that we may collect and hold from you or about you include your physical and mental health information, including your medical history and treating doctor.

## How we collect and hold personal information

We will, where possible, collect your personal information directly from you, unless it is unreasonable or impracticable to do so. If we collect your personal information from another person and it is unclear that you have consented to the disclosure of that information to us or that information is otherwise not permitted to be disclosed to us, we will, whenever reasonably possible, make you aware that we have



done this and the reasons for doing so. For example, we may collect personal information from you in person, or through telephone calls, emails, website contact forms and other correspondence to us. If you do not provide some or all of the personal information we request, we may be unable to effectively provide our services to you.

Where we are provided with personal information from a third party (i.e. a referring health practitioner), we will treat that information in the same manner as information collected directly from you.

## Website usage information and cookies

Our websites (including [www.rslqld.org](http://www.rslqld.org), [www.mates4mates.org](http://www.mates4mates.org), [www.dreamhomeartunion.com.au](http://www.dreamhomeartunion.com.au), [www.rslemployment.com.au](http://www.rslemployment.com.au), [www.rsleducation.com.au](http://www.rsleducation.com.au), [www.anzacspirit.com.au](http://www.anzacspirit.com.au), [www.rembertoremember.com.au](http://www.rembertoremember.com.au), [www.supportmates4mates.org](http://www.supportmates4mates.org)) use small data files called “cookies.” Cookies are small text files that help a website to remember the preferences of users to improve the experience of using that website. One of the primary purposes of a cookie is to save you time. For example, if you personalise the webpages on our website or register with us through our website, the cookie helps the website to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as contact details, billing addresses, shipping addresses, and so on. When you return to the same webpage, the information you previously provided will be retrieved and will autofill those same fields which ask for your personal information.

You have the ability to accept or decline cookies. Most web browsers automatically accept cookies; however, you can usually modify your browser settings and decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of our websites.

There is also information about the hardware and software on your computer that is automatically collected by our website. This information can include your IP address, browser type, domain names, browsing preferences, access times and the addresses of referring websites. This information is used by us to maintain the quality of our websites and to provide us with information regarding the use of our websites. Please keep in mind that if you place personal information on our website’s public message boards, this information may be collected and used by others. Please note that we do not monitor your online communications.

Websites linked to our websites are not subject to our privacy standards, policies, or procedures. We encourage you to review the privacy statements of websites you choose to link to from our website so that you understand how those websites collect, use, store and share your information. We have no control over and are not responsible for the manner in which the hosts of other websites collect, use, disclose and protect the personal information they collect from you.

One of the primary purposes of a cookie is to save you time. A cookie tells the web server that you have returned to a specific webpage. For example, if you personalise the webpages on our websites or register with us through our websites, the cookie helps the website to recall your specific information on subsequent visits.

For more information on how we use cookies, please click here - [RSL Queensland | Cookies \(rslqld.org\)](https://www.rslqld.org/cookies)

## Collection and use of CCTV information

At some RSL Queensland sites, CCTV cameras are installed for the purpose of building security and the safety of individuals and property. All recordings and information collected via those recordings are collected in accordance with the Privacy Act and Australian Privacy Principles, including:

- appropriate signage is installed to alert visitors and staff of CCTV recording and area coverage.
- appropriate physical, technical and operational safeguards are implemented to ensure footage is adequately protected against misuse, loss, and unauthorised access, use and disclosure.
- audio recording is disabled in our internal workspaces to ensure privacy of conversations and,
- no recording or CCTV in private areas (such as bathrooms and change rooms).

Personal information must be adequately protected against misuse, loss, and unauthorised access, use and disclosure. RSL Queensland therefore have a series of safeguards implemented, including (but not limited to):

- Physical Safeguards:
  - Ensuring the digital records are suitably housed.
  - Placing cameras out of reach.
  - Using locks and swipe card for access to rooms/offices where data is stored; and,
  - Positioning monitors or using barriers so live footage containing personal information cannot be viewed by unauthorised persons.
- Technical Safeguards:
  - Using password protection to manage staff access to stored footage.
  - Storing footage in encrypted form; and,
  - Securely deleting or writing over footage no longer needed.
- Operational Safeguards:
  - Establishing documentation regarding access to footage.
  - Limiting the number of staff who can access footage to those that 'need to know' and are authorised to access.
  - Maintaining an audit trail of who accesses footage and when it was accessed; and,
  - Keeping the footage for no longer than necessary and disposing of it appropriately.

Footage will only be accessed by persons from RSL Queensland who are authorised to do so. Should an incident occur regarding building security or staff/client safety, footage may be provided to the Queensland Police Service for law enforcement purposes. Your information will not be given to any other person or agency unless authorised or required by law.

## What we do with your personal information

We use the personal information we hold about you to do the following things:

- provide membership services.

- act as your representative in any matters that may arise from time to time involving the Department of Veterans Affairs.
- provide welfare services.
- provide accommodation services.
- provide homelessness support services.
- provide wellbeing services.
- provide clinical services.
- administer your entry in lotteries run by us.
- liaise with our District Branches and Sub Branches with whom you are involved.
- administer contracts into which we may enter with you.
- accept donations.
- supply goods.
- administer your involvement as a volunteer with us.
- communicate with you concerning our activities.
- respond to feedback.
- develop and/or test our systems.
- for our own internal administrative purposes.
- for employment.

With your consent, we do the following:

- communicate promotional offers and special events.
- conduct fundraising.
- conduct marketing activities.
- Send client surveys
- plan to improve services we offer to our members and the veteran family.

## Your payment information

Dream Home Art Union's systems and providers are compliant with the Payment Card Industry Data Security Standard (PCI DSS) and undergo rigorous audits and testing to ensure that confidentiality and the integrity of our systems and information are upheld.

Dream Home Art Union regularly performs security, vulnerability and malware scanning that is conducted by an external Accredited Scanning Vendor (ASV) to ensure our site remains free of vulnerabilities or malicious software.

Your personal information is contained behind secured networks and is only accessible by a limited number of persons who have special access rights to such systems and are required to keep the information confidential. In addition, all sensitive/credit information supplied is encrypted via Secure Socket Layer (SSL) and Transport Layer Security (TLS) technology.

We implement a variety of security measures and encryption methods, when a user places an order or enters, submits, or accesses their information, to maintain the safety of your personal information.

All transactions are processed through a secure gateway provider and your credit card information is not stored on our systems. Financial information, such as bank account details that are provided in association with a Direct Debit arrangement are stored in a secure and/or encrypted format in connection with a transaction.

If you utilise PayPal for your purchase, your PayPal account details will be collected and stored by PayPal for future transactions in connection with their Privacy Policy which can be found on their website.

Where we may collect your payment information for services outside of you Art-Union lottery, the same safeguards and systems are in place.

## Direct Marketing

By submitting your personal information to us, you expressly consent to us using your personal information to provide you with information about our products, services, or events which we consider may be of interest to you or engage in any other direct marketing activity.

We may also use your personal information for the purpose of providing you with other information which we reasonably consider to be appropriate, given the nature of previous communications with you.

Every person whose information we have collected has the option to refuse email, SMS or posted offers. You can do this via the opt-out procedures included in any communication from us. Some communications required for the operation of our business, e.g., regarding the payment of membership fees, cannot be opted out of. If you are still not satisfied with the communication you are receiving, you can contact our Privacy Officer via the contact details set out at the bottom of this document.

## Research Project Participation

The collection of personal information will be limited to that which is required for the conduct of the project. Individual participants will not be identified.

People being invited to participate in a research project must be:

- given a choice about participating or not.
- given the right to withdraw at any time.
- informed about the purpose of the research project, the information to be collected, and how information they provide will be used.
- given copies of any subsequent publications.

The collection of personal information will also support service performance research. This internal service evaluation does not require additional client consent.



## Situations where we may disclose your personal information

Through the ordinary course of business there may be instances where we need to disclose your personal information to key people or businesses including our District Branches, Subbranches, related entities, contractors, suppliers, distributors, and agents used by us. This may include for the purposes of the administration of membership services, mailing services, distribution services, IT services, data analysis, research, advertising, or consultancy services.

There may be circumstances where clinical data is shared with medical research facilities for the purpose of enhancing the health and wellbeing of veterans and their families. Unless express consent is obtained from you, all information provided to these institutions will be deidentified.

In doing so, we will take all steps as are reasonable to ensure that these parties respect and uphold the provisions of this Privacy Policy in relation to your personal information.

We may also need to disclose your personal information where we:

- are under a legal duty to comply with any legal obligation or in order to enforce or apply our terms and conditions.
- need to disclose it to protect our rights, property, or safety of our members, customers, or others, including the exchange of information with other companies, organisations and/or governmental bodies for the purposes of fraud protection and credit risk reduction.

## Artificial Intelligence

We are exploring how Artificial Intelligence (AI) can support the provision of our services. We have in place a Standard for the Responsible Use of AI which provides clear direction on the appropriate use of all information within the context of AI. This Standard prohibits the use of an Individual's Personal Information but does allow for anonymised or amalgamated data to be used. It also articulates the requirements under the Privacy Act to declare content or decisions which have been Generated via AI.

## Overseas disclosure

We do not ordinarily disclose your personal information overseas, however, before any personal information is disclosed to a recipient overseas, the Privacy Act requires us to take such steps as are reasonable in the circumstances to ensure that the recipient does not breach the APPs in relation to the information. If you consent to the disclosure of your personal information to overseas recipients, we are not required to take such steps.

By submitting your personal information to us, you expressly consent to the disclosure, transfer, storage, or processing of your personal information outside of Australia. In providing this consent, you understand and acknowledge that countries outside Australia may not have the same privacy protection obligations as Australia in relation to personal information. If your personal information is mishandled in any jurisdiction, we disclaim responsibility, and you will not have a remedy under Australian law.

## GDPR – processing European Union (EU) personal data

This section entitled “GDPR – Processing EU Personal Data” only applies if you access our products or services in the EU and your personal data (as defined in this section) is processed and/or monitored as a result.

**General:** When we process your personal information, we will comply with the General Data Protection Regulation ((EU) 2016/679) (“GDPR”), any local implementing laws and any successor legislation to the GDPR and the local implementing laws. We are the data controller (as defined in GDPR) of the data you pass to us pursuant to this policy.

Where we refer to “personal information” throughout this policy, it has the meaning set out in the Privacy Act (as explained at the beginning of this policy) and also the meaning given to “personal data” in the GDPR. “Processing” has the meaning set out in GDPR and, in practice, means doing anything with your personal information, including storing it.

**Retention:** We keep your data as per the requirements of our Information Retention & Disposal Standard which outlines the various legislative reasons and periods, we are required to retain your data, and its eventual disposal requirements in a safe and secure manner.

Additionally, if we receive a “return to sender,” bounce-back email or similar message when we contact you, we will delete the relevant personal information from our system. We will also delete or update your personal information if you ask us to do so in accordance with the requirements of GDPR.

**Grounds for processing:** We collect most of your personal information on the grounds of our legitimate interests or fulfillment of a contract, for example, providing you with the Dream Home Art Union tickets you have purchased and liaising with you in respect of those tickets. If we deem it appropriate, we may also rely on legitimate interests to send you marketing communications, including where you have opened a customer account for the Dream Home Art Union or purchased tickets for the Dream Home Art Union. If we are unable to rely on legitimate interests or another ground to process your personal information, we will seek consent from you in accordance with the requirements of GDPR.

If we have obtained consent from you to process your data, you have the right to withdraw your consent at any time. To withdraw your consent, please contact us using the contact information set out below. Please bear in mind that if you withdraw your consent, it may affect our ability to carry out tasks for your benefit. Withdrawal of your consent will not affect any processing we have carried out in respect of your personal information prior to you withdrawing consent.

In the section entitled, “What we do with your personal information,” we have explained that we may need to disclose your personal information to certain third parties. If any of those third parties are located outside of the European Economic Area (EEA) we will ensure that there are appropriate safeguards in place when the data is transferred in accordance with the requirements of GDPR.

**Automated decision making:** If you purchase a Dream Home Art Union ticket, your success or otherwise will be determined as a result of a process of automated decision making. We carry out this example of automated decision making on the grounds that it is necessary to fulfil the contract we have entered into with you.

Your rights: There are a number of rights available to you under GDPR. These include but are not limited to:

- The right to access your personal information and ask us to provide certain information about the processing we carry out in respect of your personal information.
- The right to ask us to rectify any personal information we process that you believe is incorrect or incomplete.
- The right to ask us to erase your personal information.
- The right to ask us to restrict the processing we carry out in respect of your personal information, or to object to the processing we carry out.
- The right to have your data provided to another data controller in a structured, commonly used, and machine-readable format (data portability).

Please note that there are some exceptions and caveats to the rights listed above.

Complaints: In addition to your rights set out above in the section entitled, "Complaints and concerns," you are entitled to complain to the relevant supervisory authority in your jurisdiction. A list of the supervisory authorities throughout the European Union is available here - [Our Members | European Data Protection Board \(europa.eu\)](#)

## Security of data and information

We take all reasonable care to preserve the security of personal information collected or submitted to us both physically (paper based hard copy documents) and digitally. Personal information is stored in a controlled and secure environment.

We take all reasonable steps to protect the personal information we hold from misuse, loss and from unauthorised access, modification, or disclosure.

When personal information (such as payment information) is transmitted to other websites, it is protected through the use of encryption, such as the Secure Socket Layer (SSL) protocol.

If we suspect that a data breach has occurred, we will follow the requirements of the Data Breach Notification scheme under the Privacy Act. This includes the requirements to notify affected individuals and the Office of the Australian Information Commissioner in some circumstances.

## Retention, Destruction and de-identification

Generally, we will retain your personal information whilst it is required for any of our business functions, or for any other lawful purpose. We will destroy or de-identify personal information in accordance with our data security and data destruction policies or when our legal obligations to retain the information have expired and the information is no longer needed by us.

## Your consent

By using our website, accepting our Art Union terms and conditions or any other terms and conditions generated by us which refer to this Privacy Policy, or by entering an RSL Queensland building which

uses CCTV, you are agreeing to our collection, disclosure, use and storage of your personal information in accordance with this policy.

## Pseudonymity or anonymity

You have the option not to identify yourself or you may use a pseudonym when dealing with us, provided it is lawful and practical to do so.

Please note that we may not be able to provide you with our full range of services if we are not provided with your true identity.

## Access to your personal information

You may request access to the personal information we hold about you by writing to our Privacy Officer at the address below.

You do not have to provide a reason for requesting access. Except in circumstances established under the APPs, if we hold personal information that you are entitled to access, we will endeavour to provide you with a suitable range of choices as to how you may access that information (e.g., post or collection). We may ask you to complete an Access Request form to help us identify and locate the information being requested.

If you believe that the personal information, we hold about you is incorrect, incomplete, or inaccurate, you can ask us to amend it.

If we agree that the information, we hold is inaccurate, we will amend it. If we do not agree, then we will add a note to the personal information stating that you disagree with its accuracy.

## Complaints and concerns

If you have a problem, complaint or wish to enquire about our Privacy Policy, please contact our Privacy Officer.

We will respond to your complaint in accordance with the relevant provisions of the Australian Privacy Principles as soon as practicable.

We treat complaints relating to privacy very seriously. If you submit a concern or complaint, we will endeavour to deal with it comprehensively and reach an outcome where all parties are satisfied.

If you are not satisfied with our response to your complaint, or if you would like further information about privacy in Australia, then we suggest you contact the Office of the Australian Information Commissioner at [oaic.gov.au](http://oaic.gov.au)

## Changes to this Privacy Policy

It may be necessary for us to review and revise our Privacy Policy from time to time. An amended version will be posted on our website at [www.rslqld.org](http://www.rslqld.org).

## Contact details

If you have any questions about this policy or if you have any complaint regarding the treatment of your privacy by us, please contact us in writing using the following details:

The Privacy Officer  
Returned and Services League of Australia (Queensland Branch)  
283 St Pauls Terrace  
Fortitude Valley QLD 4006

Ph: (07) 3634 9444

Fax: (07) 3634 9400

[privacy@rslqld.org](mailto:privacy@rslqld.org)

## Related Documents

### Key Legislation:

- *Privacy Act 1988 and Australian Privacy Principles*
- *Privacy and Other Legislation Amendment Act 2024*

### RSL Queensland Related Documents:

- Code of Conduct
- Fraud, Bribery & Corruption Policy
- Whistleblower Policy
- Building Security Procedure
- Responsible Use of AI Standard
- Information Retention & Disposal Standard
- Information Security Policy

## Need more info?

For questions about this policy, please contact our General Manager – Legal & Governance and Privacy Officer.

**Governance POL-74 | Privacy Policy** | Authorised By: GM Legal & Gov/ EGM People & Organisational Performance | Endorsed By: Audit & Risk Committee | Approved By: RSL Queensland Board | Version: 2.0 | Published: 01/08/2025 | Review: 30/03/2026 |  
Warning: Uncontrolled when printed