



FINANCIAL COUNSELLORS' ASSOCIATION  
OF WESTERN AUSTRALIA

## 4.7 Website Privacy

This policy relates to:	
Standards or other external requirements:	
Legislation or other requirements:	Privacy Act 1988 Associations Incorporation Act 2015
Contractual obligations:	

### 4.7.1 Policy

This Website Privacy policy deals with the protection of your privacy while you use the website owned and operated by the Financial Counsellors' Association of Western Australia Incorporated (FCAWA) and located at [www.fcawa.org](http://www.fcawa.org).

FCAWA is committed to the protection of your privacy while you use their website.

This Website Privacy policy only applies to the FCAWA website which It may contain links to other websites or applications. This Website Privacy policy does not apply to any of the linked websites or applications.

FCAWA gathers certain information from users of their website, and this policy explains what information is collected, how it is used, and your rights in relation to it.

By continuing to use the FCAWA website you acknowledge that you have had the chance to review and consider this Website Privacy policy, and you acknowledge that you agree to it. This means that you also consent to the use of your information and the method of disclosure as described in this Website Privacy policy. If you do not understand the Website Privacy policy or do not agree to it then please do not use the FCAWA website.

#### 4.7.1.1 Definitions

**Company IP** includes, but is not limited to, the contents, layout, design, colours, appearance, graphics and imagery of the website, content and materials as well as all copyrights, trademarks, trade secrets, patents and other intellectual property contained in the FCAWA website.

**Content** means any content, writing, images, audiovisual content or other information published on the FCAWA website.

**Items** means any and all of the product, services, content and materials collectively.

**Materials** means any materials, information or documentation that FCAWA may provide to you in connection with your use of the services or FCAWA website including documentation, data, information developed by, or owned by FCAWA, and other materials which may assist in your use of the services or FCAWA website.

**Parties** means both you (the user of the product) and FCAWA (the owner of the product) collectively.

**Personal information** means information that FCAWA obtains from you in connection with your use of the FCAWA website.

**Website privacy policy** means this Website Privacy policy.

**FCAWA website or website** means the website including all pages, all sub-pages, all blogs, all forums, all other connected pages and all other connected internet content whatsoever, the home page or main page of which is located at [www.fcawa.org](http://www.fcawa.org).

**Services** means any or all services provided by or on the product.

**Third party links** means links or references to websites other than the FCAWA website, to content other than the content or to materials other than the materials, none of which are controlled by us.

**The owner, their, them** refers to the Financial Counsellors' Association of Western Australia Incorporated (FCAWA).

**The owner, their, them** also includes any employees, affiliates, agents or other representatives of the Financial Counsellors' Association of Western Australia Incorporated (FCAWA)

**You or your** refers to the user of the FCAWA website.

**Your content** means any content posted to or added to the FCAWA website, content or materials by you or by somebody authorised by you or doing so on your behalf.

#### **4.7.1.2 Interpretation**

In this Website Privacy policy, unless the context otherwise requires, the following rules of interpretation shall apply:

- Words referring to one gender include every other gender.
- Words referring to a singular number include the plural, and words referring to a plural include the singular.
- Words referring to a person or persons include companies, firms, corporations, organisations and vice versa.
- Headings and titles are included in this Website Privacy policy for convenience only and shall not affect the interpretation of this Website Privacy policy.
- Each party must, at its own expense, take all reasonable steps and do all that is reasonably necessary to give full effect to this Website Privacy policy and the events contemplated by it.
- Any obligation on a party not to do something includes an obligation not to allow that thing to be done.

#### **4.7.1.3 Type of Information and How it is Collected**

When you use the FCAWA website, FCAWA may collect information from you through automatic tracking systems (such as information about your browsing preferences).

In addition, FCAWA may collect information that you volunteer to us (such as information that you provide during a sign-up process or at other times while using the website).

In order to access some specific features of the FCAWA website, you are required to provide some personal information. During this process, FCAWA collects some of your personal information, in the following manner:

- FCAWA will not collect information that identifies you personally, except when you specifically volunteer that information to them when using specific product features. These specific product features might include, but are not limited to:
  - i. Making purchases.

- ii. Receiving general emails from FCAWA.
  - iii. Commenting on FCAWA content such as blogs, articles, photographs or videos, or participating in FCAWA forums, bulletin boards, chat rooms or other similar features.
- In addition to any personal information that you are required to provide in order to access these additional product features, in some cases you may be required to provide more specific information. For example, in order to make purchases, you may need to provide credit card information, billing information and postal addresses.

#### **4.7.1.4 Cookies**

Cookies are small files stored on your computer or mobile device which collect information about your browsing behaviour.

Cookies do not access information which is stored on your computer.

Cookies enable FCAWA to tailor their website configurations to your needs and preferences, in order to improve your user experience.

Most internet browsers accept cookies automatically, although you are able to change your browser settings to control cookies, including whether or not you accept them, and how to remove them. You may also be able to set your browser to advise you if you receive a cookie, or to block or delete cookies. However, if you do this, you may be prevented from taking full advantage of the FCAWA website.

#### **4.7.1.5 How Your Information is Stored**

Please note that no systems involving the transmission of information via the internet, or the electronic storage of data, are completely secure. However, FCAWA takes the protection and storage of your personal information very seriously and will take all reasonable steps to protect your personal information.

FCAWA uses appropriate physical, digital, managerial and security systems to store your personal information and to protect it against unauthorised access, destruction or disclosure.

#### **4.7.1.6 Combining Information**

FCAWA may combine, link or aggregate some of your information in order to obtain a better understanding of your requirements. This may enable FCAWA to better design their website and may also assist with their business or administration requirements.

FCAWA may also share aggregated information with third parties but only if that aggregated information does not contain any information that identifies you personally.

#### **4.7.1.7 How Your Information is Used**

FCAWA uses your personal information to help them improve your experience with their website.

#### **4.7.1.8 Vulnerable Users**

FCAWA may collect information from specific categories of users who may be particularly vulnerable, including: people in financial hardship.

Information collected from vulnerable users in accordance with this clause is collected for the purpose of helping FCAWA to improve their website and your user experience.

Information collected from vulnerable users in accordance with this clause, is collected, used and if applicable, disclosed, in accordance with the general provisions of this Website Privacy policy.

#### **4.7.1.9 Merger or Restructure**

Part or all of the FCAWA organisation may be merged or restructured including, but not limited to, through an ordinary sale of business, a corporate reorganisation, a change in control, bankruptcy or insolvency proceedings.

In the event that such a merger, restructure occurs as described in the preceding sub-clause, FCAWA may transfer your personal information, including personally identifiable information, as part of that merger or restructure.

#### **4.7.1.10 Information you Release**

You acknowledge and agree that if you publish or submit personal information in publicly accessible sections of the FCAWA website (such as forums, bulletin boards, chat rooms, or other similar sections), then you are solely responsible for the release of that personal information and FCAWA is not liable or responsible in relation to the release of that personal information.

#### **4.7.1.11 Email Opt In/Out**

If you receive an email from FCAWA in relation to their website and would prefer not to receive such correspondence in the future, you may follow the instructions in the email to opt out of future correspondence. You may also contact us, using the details at the bottom of this Website Privacy policy, in order to opt out of future correspondence. We will make all reasonable efforts to promptly comply with your requests. However, you may receive subsequent correspondence from us while your request is being handled.

#### **4.7.1.12 Accessing, Updating and Correcting your Personal Information**

You have the right to request access to any of your personal information which we are holding.

You have the right to request that any of your personal information which we are holding be updated or corrected.

In order to request access, an update or a correction to your personal information, you may contact us using the details provided in the last clause of this Website Privacy policy.

#### **4.7.1.13 Disclaimer Regarding Security**

By continuing to use the FCAWA website, you agree to the terms of this Website Privacy policy. You acknowledge, agree and accept that no transmission of information or data via the internet is completely secure. You acknowledge, agree and accept that FCAWA do not guarantee or warrant the security of any information that you provide to them, and that you transmit such information at your own risk.

#### **4.7.1.14 Changes to this policy**

FCAWA may make changes to this Website Privacy policy at any time in their sole discretion.

If FCAWA makes changes to this Website Privacy policy, unless they have obtained your express consent to those changes, then such changes will only apply to any information that FCAWA obtains from you after the date that the changes take effect.

If FCAWA makes changes to this Website Privacy policy, your continued use of the product after the date that the changes take effect confirms that you acknowledge, accept and agree to those changes.

#### **4.7.1.15 Complaints**

FCAWA takes customer satisfaction very seriously. If you have a complaint in relation to FCAWA's handling of your personal information, they will endeavour to handle it promptly and fairly. For your information, an overview of FCAWA's complaints handling procedure is as follows:

- Any complaints are forwarded to the CEO for review. FCAWA will aim to review all complaints within 7 days of receiving them (although this cannot be guaranteed). If necessary, the CEO may then refer the complaint to another section within FCAWA for consideration. If further information is required, FCAWA may contact you to request that information. If FCAWA accepts fault in relation to the complaint then it will propose a resolution (which may or may not be the same as any resolution proposed by you). If FCAWA do not accept fault, then they will contact you to advise you of this. FCAWA will aim to complete this entire process within 21 days (although this cannot be guaranteed). If you do not provide complete information this is likely to delay the handling of your complaint.
- To lodge your complaint with FCAWA, send an email to the following address, and provide full details:
  - [enquiries@fcawa.org](mailto:enquiries@fcawa.org)
- If you are not satisfied with FCAWA's response to your complaint, you may refer your complaint to the relevant external dispute resolution organisation in your area.

#### **4.7.1.16 Contact Us**

You can contact FCAWA about this Website Privacy policy using the following details:

45 Duncan Street, Victoria Park WA 6100  
Tel: 08 9325 1617  
Email: [enquiries@fcawa.org](mailto:enquiries@fcawa.org)  
[www.fcawa.org](http://www.fcawa.org)

#### 4.7.2 Documentation

Documents related to this policy:	
<b>Related policies</b>	1.3 Board Confidentiality and Conflict of Interest policy 3.1 Human Resources policy 3.5 Grievances, Complaints and Disputes policy 4.1 Records Management policy 4.6 Privacy policy
<b>Forms, record keeping or other organisation documents</b>	Confidentiality Agreement FCAWA Constitution

Reviewing and approving this policy:		
Frequency	Person responsible	Approval
3 years	CEO	CEO

Policy review and version tracking:			
Review #	Date Approved	Approved By	Next Review Due
1	10/11/2025	CEO	November 2028
2			
3			