

## Privacy Policy

March 2021

<b>Board Ratification Date</b>	March 2021 May 2017 Apr 2014 May 2010	
<b>Reaffirmation Date</b>		
<b>Revision Date</b>	8 Apr 2014	Revising to ensure compliance with the newly revised Australian privacy law
	May 2017	Updating Cookies section under Online Activity and Social Media on Page 5
	March 2021	Reviewed by Minter Ellison (legal) to ensure compliance with the Australian Privacy Principles, the Privacy Act (1988) and the ACFID Code of Conduct.
<b>Next Review Date</b>	Oct 2023	Or when required by Australian Government or other regulatory bodies.

## Your privacy is important to us

Act for Peace Ltd (ABN 86 619 970 188) (“we”, “us” and “our”) is the international aid agency of the National Council of Churches in Australia . Your privacy is very important to us and we are committed to using your personal information responsibly. When handling personal information we are guided by the *Privacy Act 1988* (Cth) (**Privacy Act**) and any other applicable privacy laws, the Australian Privacy Principles (Schedule 1, Privacy Act), and the ACFID code of conduct.

This Privacy Policy sets out how we manage personal and sensitive information, including in relation to our website located at [www.actforpeace.org.au](http://www.actforpeace.org.au) ("Website") and what to do if you have questions, concerns or complaints. We may occasionally revise this Privacy Policy in our sole discretion by updating our privacy webpage [www.actforpeace.org.au/privacy](http://www.actforpeace.org.au/privacy). The revised Privacy Policy will take effect when it is posted on our Website.

In this Privacy Policy, personal information as defined in the Privacy Act means any information or opinion about an identified individual or an individual who is reasonably identifiable, whether true or not and whether recorded in material form or not. Sensitive information as defined in the Privacy Act includes, but is not limited to, information or an opinion about an individual's race or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs and health information.

By making a donation, signing a petition or campaign action, registering for our email newsletter, visiting our Website, volunteering with us, applying for employment with us or otherwise providing us with your personal information, you consent to your personal information (including your sensitive information) being collected, used and disclosed, and stored as set out in this Privacy Policy.

Remember, you are in control of the personal information you have with us. You can choose what personal information you provide to us (including being anonymous or using a pseudonym), and subject to certain legal exceptions you can change or access your personal information in accordance with this Privacy Policy.

If you have any questions about this Privacy Policy or if you wish to request access to your personal information, correct or update your details, raise any privacy concerns, opt out of future communications, or have any queries, please contact us at:

- attention: Complaints Officer
- emailing [info@actforpeace.org.au](mailto:info@actforpeace.org.au);
- calling 1800 025 101; or
- writing to Act for Peace, Locked Bag Q199, QUEEN VICTORIA BUILDING NSW 1230

## Why do we collect your personal information?

We collect personal information to meet your expectations as a supporter including for the purpose of processing your donations, newsletter subscriptions, or change of details – to tell you about our work and about opportunities to take action including through campaigns, appeals, events or volunteering. It is important that we tell you about how your support is making a difference to the communities we serve together. To help us communicate with you better we collect information about your history and engagement with Act for Peace, as well as details you may choose to provide about your values, interests and beliefs.

You can set your own preferences for how you will hear from us by contacting us using the contact details above.

You do not have to provide us with your personal information and it’s your choice how much information you provide. However if you do not provide us with your personal information, it will be

difficult for us to contact you or fulfil a request. For example, we can't give you a tax receipt, record your support for a petition or send you information about the work you are funding if we don't have your name and address.

Where we collect your personal information for a specific purpose not outlined above, we will provide you with a collection notice which explains the primary purpose and any related secondary purposes for which we are collecting your personal information.

We also collect personal information about you if you are an employee, contractor, consultant, volunteer or job applicant.

### **What information do we collect?**

The types of personal information we collect may include:

- personal details, like your name, date of birth or gender
- contact details, like your address, phone numbers and email address
- payment information for donations, such as your bank account or credit card details
- a history of your support for our work and interactions with Act for Peace, including donations, petitions and campaign actions, emails, and letters and phone calls
- your communication preferences
- details you may choose to provide about your values, interests and beliefs including your denomination or home parish (some of which is defined in the Privacy Act as sensitive information)
- your interactions with Act for Peace-related websites
- photos or stories about you if you have attended one of our events
- work experience or references, and bank account details for payment if you apply to work or volunteer with us
- Your passport details if you are likely to travel internationally on a work or volunteer assignment for Act for Peace.

### **How do we collect your personal information?**

In most cases, we'll ask you for this information directly, for example when we ask you to complete a donation coupon, in a telephone conversation with you, when you sign a petition online, in a survey or in a form relating to human resource management if you volunteer or work with us..

However, some information is collected automatically (like via cookies on our Website which collect information regarding the online activity of visitors to our website) or from another source (like updating mailing addresses from Australia Post, information that is listed in public directories, obtaining details for potential future supporters from like-minded organisations or where we buy a marketing list you have agreed to be on). If someone makes a donation on your behalf, and asks that you receive information about their gift, we will collect the personal information they provide about you. We also collect information from third-party suppliers who fundraise for us, or organise workplace giving.

### **How do we use your personal information?**

We are committed to maintaining your privacy and we will only use your personal and sensitive information for the purpose for which it was provided to us, other related purposes that would reasonably be expected by you, with your consent, or where we are permitted or required to do so by law.

Such purposes include:

- processing donations and issuing receipts
- responding to your comments or questions
- providing follow-up information about Act for Peace's activities
- supporter research
- requesting financial, campaigning, volunteering or other support
- measuring the level of support received and the effectiveness of our campaigns
- providing you with marketing material such as our newsletter (unless you opt-out of receiving such information)
- complying with our reporting obligations to the Australian Taxation Office and other government agencies
- any other purposes identified at the time of collecting your information
- managing volunteers, employees, contractors, and consultants
- the general management and conduct of Act for Peace
- complying with our legal obligations.

If we also obtain your sensitive information, we will only use your sensitive information (such as your faith, values or opinions) for the purposes listed above, or other directly related purposes or purposes to which you otherwise consent.

### **Use and disclosure of your personal information**

We occasionally may require external suppliers to assist us in our activities, for example when printing a large number of letters to our supporters, and if appropriate, we may provide your personal and sensitive information to third parties who provide services on our behalf (such as mail, database, telephone, IT, cloud storage, audit, payment processing and research services). While most of these suppliers are based in Australia, your personal information may be transferred to a destination outside Australia.

In any case where we need to disclose your information to a third party, we will ensure this is done securely and only for the purposes outlined above. We have confidentiality agreements in place with many of our service providers and external agencies, and with staff and volunteers who handle personal information that we provide to them.

Importantly, we won't rent, sell or exchange your information.

We will not use or disclose your personal and sensitive information for any purpose other than the purpose for which it was collected (or a related purposes), in accordance with your consent and instructions, as provided through the exclusions set out in the APPs, in accordance with the specific collection notice provided to you by us at or near the time of collection of your personal and sensitive information, or where we are permitted to do so by law.

### **How do we keep your information secure?**

We take commercially reasonable steps to keep your information safe (whether electronic or in hard copy) and to keep it accurate, complete and up to date. For example, whenever we ask for your financial details online, we use security-encrypted response forms. Our employees and service providers are obliged to keep personal and payment card information confidential and secure. We keep most of your personal information secure in our supporter database, and physical copies of your information, such as donation forms, are kept securely and destroyed if not needed. Your personal information will stay on the database indefinitely until you advise you would like it removed, unless we take such steps as are reasonable in the circumstances to de-identify it or destroy it earlier in accordance with applicable privacy law requirements. Staff and volunteers are required to sign our

policies relating to privacy, and background and police checks are conducted for relevant roles.

## **Online Activity and Social Media**

### *Cookies*

When you visit our website, we will collect and store your computer's assigned IP address, the date and time of your visit, the information accessed and the referring page. We will also collect other data for statistical purposes. This information may sometimes be linked to your personal information. Like many websites, our website may use 'cookies' from time to time to record some of this information. Cookies are small text files that the website transfers to your computer through your web browser to enable the website's systems to recognise your computer. This information may be used for personalising your experience on our websites and the communications you receive from us, or for website administration, statistical and maintenance purposes. You have the ability to accept or decline cookies by modifying the settings in your browser. Please note that some parts of the website may not function fully for users that disallow cookies.

### *Third party links*

Our website contains hypertext links to other third-party websites. Act for Peace is not responsible for the privacy practices or the content of such websites which will be governed by the privacy policy of third parties.

### *Social Media*

You can also engage with Act for Peace through social media, like Facebook, Twitter, Instagram, etc. You can always control how you receive content through each platform's settings.

## **Accessing and correcting your information**

We will, on request, provide you with access to the personal information we hold about you subject to certain legal exceptions. We will notify you of the basis for any denial of access to your personal information. If you wish to have your personal information deleted, we will take reasonable steps to delete it subject to certain legal exceptions, including where we need to keep it for legal, auditing or internal risk management reasons.

You may ask us to update, correct or delete the personal information we hold about you, subject to certain legal exceptions. We take reasonable steps to ensure that the personal information that we collect and hold is accurate, complete and up-to-date. However, we rely on you to advise us of any changes to your personal information to help us maintain accurate, complete and up-to-date information. If we are satisfied that any personal information we hold about you is inaccurate, incomplete, out of date, misleading or irrelevant (having regard to the purpose for which it is held) we will take such steps (if any) as are reasonable in the circumstances to correct that personal information. This may include notifying third parties to whom we have disclosed that personal information. If we do not agree that personal information we hold about you is inaccurate, incomplete, out of date, misleading or not relevant you may ask that we attach a statement to this effect to our record.

To request access to your personal information, or if you wish to update or correct your personal information, please contact us using the contact details provided above.

### Direct marketing communications

Where we use your personal information to send you marketing and promotional information by post, email, SMS or telephone, we will provide you with an opportunity to opt-out of receiving such information. By electing not to opt-out, we will assume we have your implied consent to receive similar information and communications in the future. We will always ensure that our opt-out notices are clear, conspicuous, and easy to take up.

If you do not wish to receive future direct marketing communications from us, please contact us using the details provided above.

### Making a query or complaint

We are committed to protecting your privacy and upholding the Australian Privacy Principles (APPs). If you have any queries or you believe we have breached this policy or the APPs please contact us with your concerns using the contact details above.

We take all complaints very seriously and we will endeavour to respond to your complaint and address your concerns as soon as reasonably practicable. We will refer your complaint to our Complaints Officer (via the details above) who will investigate the issue and determine the steps that we will undertake to resolve your complaint. We will contact you if we require any additional information from you and will notify you in writing of the outcome of the investigation. If you are not satisfied with our decision, you can contact us to discuss your concerns or contact the Australian Information Commissioner (**OAIC**). To make a query concerning your privacy rights, or to lodge a complaint with the OAIC about how we have handled your personal information, you can contact the OAIC via [www.oaic.gov.au](http://www.oaic.gov.au). The OAIC has the power to investigate the matter and make a determination.

### Annex 1. Resource and Reference List

- Privacy Act 1988 (Cth)
- Australian Privacy Principles (Schedule 1, Privacy Act)
- ACFID Code of Conduct, revised 1 January 2019: <https://acfid.asn.au/content/read-code>