

Privacy Policy

Context

Under the [Privacy Act 1988](#) (Privacy Act) the Australian Information Commissioner may issue guidelines regarding acts or practices that may have an impact on the *Privacy* of individuals.

The [Australian Privacy Principles](#) (APPs) – as amended from time to time - apply from 12 March 2014 and cover both Australian Government agencies and organisations covered by the Privacy Act.

The ABM and AID Boards recognise that ABM and AID are both APP entities as defined in the Act.

Purpose

This policy details how Anglican Board of Mission Australia Ltd (ABM) and Anglicans in Development Ltd (AID) manage personal information in an open and *Transparent* way and comply with the Privacy Act (1988) and the [Australian Privacy Principles](#)

Scope

This policy applies to the collection, storage and disclosure of personal *Privacy* information by ABM and AID.

Policy Commitments

ABM and AID will:

- 1 Take all reasonable steps to ensure they comply with this policy.
- 2 Have operating procedures that comply with the Australian *Privacy Principles* as amended from time to time.
- 3 Maintain and make publicly available a clearly expressed and up-to-date Statement covering the management of personal information by ABM and AID in compliance with the Australian *Privacy Principles* (See “Statement of Personal Information Privacy” below)
- 4 Allocate sufficient resources to ensure compliance with the Australian *Privacy Principles*.
- 5 Train staff and all other relevant people within ABM and AID in the *Privacy* policy and procedures.
- 6 Review the *Privacy* Policy and procedures regularly and keep them up to date.

Responsibilities for Implementation of this Policy

The ABM and AID Boards will

- oversee the implementation of this policy
- ensure ABM and AID exercise their duty of care to ensure the *Safety of Children* impacted by their work in Australia and overseas;

The ABM and AID Policy Committee will

- ensure this policy is reviewed at least every five years

The ABM Marketing and Communications Manager will

- Notify the ABM and AID Policy Committee of any changes to the *Privacy Act* or Australian *Privacy Principles* which may affect this policy.
- Provide training in this policy to relevant staff and Board members as appropriate.

The ABM Program Manager – Compliance will

- ensure this policy is appropriately filed and is placed on ABM website.

Standards, Policies and Procedures Relevant to this Policy

[Privacy Act 1988](#)

[Australian Privacy Principles](#) (APPs)

STATEMENT OF PERSONAL INFORMATION PRIVACY

The ABM-AID *Privacy Policy* (above) governs all personal information collected by and provided to ABM or AID. The Policy must be adhered to by all persons who access, use, process, control or otherwise deal with personal information on ABM's or AID's behalf. This Policy applies to independent contractors and job applicants, as well as individuals who provide us with their personal information.

The ABM-AID *Privacy Policy* does not apply to acts and practices which ABM or AID undertake that relate directly to the employee records of our current and former employees.

What is personal information?

Personal information is any information that can be used to identify you. This includes any personal information or opinions about you, whether true or not, no matter how the information or opinions are recorded. The information may be collected from you directly or provided to us by another party.

Sensitive information is a special category of personal information and includes, but is not limited to, information about your health, race or ethnic origin, political or religious beliefs, membership of a trade union or association, or criminal record. Health information includes personal information collected from you in order to provide a health service. There are greater restrictions that apply to our collection, storage, use and disclosure of sensitive information under the Privacy Act.

Why do we collect personal information?

When we collect your personal information, we will provide you with additional information about the reason for collection. We may also provide you with additional information specific to collecting that information.

If you have agreed to our using your personal information we may use the information for one of several purposes. These will be dependant on the circumstances relevant to your situation.

- to lawfully carry out our functions and activities;
- to deliver the products and services that you requested;
- to provide you with further information about the products and services you requested;
- to personalise and customise your experiences with us;
- to help us review, manage and enhance our services;
- to develop insights used in reports or other content created by us;
- to communicate with you;

- for administration purposes, including charging, billing and collecting debts;
- to promote and market those of our other products and services which we consider may be of interest to you;
- when considering making offers to job applicants and prospective employees or for employment purposes; and
- to receive services from you or the Organisation which employs you.

In addition to the above we may use the personal information we collect for the purposes of:

- providing you with news about any products and services;
- sending you marketing and promotional material that you may be interested in;
- managing and enhancing products or your experience on our website and domains;
- conducting surveys or promotions;

We will only use or disclose your personal information for the purposes of direct marketing if:

- we collected the information from you;
- it is reasonable in the circumstances to expect that we would use or disclose the information for direct marketing purposes;
- we provide you with a simple means to 'opt-out' of direct marketing communications from us, and you have not elected to 'opt-out' from receiving such direct marketing communications from us.

You may opt-out of receiving such communications by:

- clicking a link on the email communications sent to you
- contacting our Office by telephone on 02 9264 1021 or at info@abmission.org.au
- writing to us at ABM, Locked Bag Q4005, QVB, NSW 1230.

What happens if you choose not to provide your personal information?

You are not obliged to give us your personal information. If you would like to access any of our services on an anonymous basis or using a pseudonym, we will take reasonable steps to comply with your request. However, we will require you to identify yourself if: we are required by law to deal with individuals who have identified themselves; or it is impracticable for us to deal with you if you do not identify yourself or elect to use a pseudonym.

Please also be aware that your request to be anonymous or to use a pseudonym may affect our ability to provide you with the requested goods and/or services and the range of options available to you or your Organisation may be limited.

What personal information do we collect?

The nature and extent of personal information we collect varies depending on your particular interaction with us and the nature of our functions and activities. Personal information that we commonly collect from you would include (but is not limited to):

- your name, position, date of birth;
- your address, email address, telephone numbers, gender, Government Issued identifiers;
- your financial information, including credit card and banking information, business references, details about your business, Australian Business Number;
- Details of products or services we provide to you
- Information about how you interact with the products and services we provide.
- Records of our interactions with you

- Details of products or services you provide to us
- Social media profiles and related information that you make available to us or to the public generally
- your occupation, career history and references.

We collect personal information from individuals and a variety of organisations. These include:-

- Our employees
- Job Applicants
- Volunteers
- Associates
- People we provide services to
- Suppliers
- Individual members of the public (donors and supporters of ABM and/or AID)
- Other Businesses or Church Organisations

How do we collect personal information?

We collect Personal Information from you when you:

- donate via our donor services,
- complete your registrations to our events or webinars;
- participate in surveys or purchase our products or services;
- deal with us as an independent contractor;
- apply for a job;
- require assistance from us;
- become an associate of ABM; or
- interact with our products and services on our website or Social Media

We also collect information from service partners whom we engage to provide services on our behalf.

Where possible, we collect your personal information directly from you. In some circumstances, we may obtain personal information from a third party.

Website and Google analytics

Information we collect may include:

- the Internet Protocol address and a component of the domain name you have used (e.g. .com or .net);
- the type of browser and operating system you used;
- the date and time you visited our website;
- the web pages or services you accessed at our website;
- the time you spent on individual pages and our website overall;
- which files you downloaded;
- information about your computer and Internet connections using cookies.

We use Google Analytics Demographics and Interest Reports to obtain a more detailed understanding of our Website users and their potential needs.

We do not collect personal information through website and Google analytics. Only aggregated data is used for planning purposes.

When do we disclose your personal information?

For the purposes referred to above in this *Privacy Policy*, you acknowledge and agree that we may disclose personal information and you consent to us disclosing such personal information to:

- our Affiliated Entities;
- third parties engaged by us to perform functions or provide products or services on our or their behalf such as mail-outs, marketing or advertising; third parties that sponsor or promote us;
- third party contractors engaged to provide online credit card account processing and related services. When you pay your accounts online, a secure server is used which encrypts the information you send through our website. We make no warranty in respect of the strength or effectiveness of that encryption and we are not responsible or liable for events arising from unauthorised access of the information you provide; your referees and former employers;
- credit agencies;
- our professional advisors, including our accountants, auditors and lawyers;
- persons authorised by you to receive information held by us; and
- any persons as required or permitted by any law.

We will not rent, sell, or exchange your information without your consent.

We do not send personal information overseas.

Access to your personal information

If you require access to your personal information, please contact the ABM and AID Executive Director at John.Deane@abmission.org.au.

In order to process a request, we will require it to be in writing and additionally require that you provide proof of your identity. If you request access to personal information, we will respond to your request within a reasonable period and, if reasonable and practicable, give access to the information in the manner requested.

There are some circumstances where we will not be able to comply with a request to access personal information. If we refuse to give access to the personal information because of an legal exception that applies we will give you a written notice that sets out at a minimum our reasons for the refusal (to the extent it is reasonable to do so), and the mechanisms available to challenge the refusal.

We reserve the right to charge you reasonable expenses for providing access to personal Information. For example, a fee for photocopying any information requested by you. Nothing in this *Privacy Policy* replaces other informal or legal procedures by which you can be provided with access to personal information.

Correction of your personal information

We request that you keep your personal information as current as possible. If you feel that information about you is not accurate or your details have or are about to change, you can call us on 02 9264 1021 and we will correct or update your personal information.

If you request us to correct your personal information, we will:

- respond to your request within a reasonable period; and
- if reasonable and practicable, correct the information in the manner requested.
- If we refuse a request to correct personal information, we will:

- give you a written notice setting out the reasons for the refusal and how you may make a complaint; and take reasonable steps to include a statement with your personal information we refuse to correct.

Nothing in this Privacy Policy replaces other informal or legal procedures by which you can correct personal information.

Integrity of your personal information

We will take reasonable steps to:

- ensure that the personal information that we collect is accurate, up to date and complete;
- ensure that the personal information that we hold, use or disclose is held with regard to the relevant purpose communicated to you;
- secure your personal information while it is being held by us.

We will take reasonable steps to protect your personal information from:

- misuse, interference and loss; and
- unauthorised access, modification or disclosure.

Electronic information is protected by various security measures (including encryption and password protection) and physical paper files are stored in a secure location. Personal information is de-identified where appropriate. Data protection includes the use of password access areas and secure servers.

We will take reasonable steps to destroy or de-identify any personal information held by us if we no longer need to hold the information for the purpose for which it was collected provided we are not otherwise required by law to retain the information.

Website

This Privacy Policy is posted on the ABM Website.

Updating

ABM and AID reserve the right to review, and if necessary, change our Privacy Policy. Any changes to this Privacy Policy will be posted on the ABM website.

Complaints

If you have a complaint about how we collect, use, disclose, manage or protect your personal information, or if you otherwise consider there may be a breach of the Privacy Act (1988) or the Australian Privacy Principles, please contact us in writing. We treat all complaints seriously and intend to resolve your complaint within a reasonable timeframe. Please refer to our [Complaints Policy](#) available on our website or in hard copy by telephoning ABM/AID on +61 (0)2 9264 1021.

Contact

Please forward all correspondence in respect of this Privacy Policy to the Executive Director who can be contacted by mail, telephone or email as follows:

Anglican Board of Mission

Locked Bag Q4005

QVB NSW 1230

Ph: 02 9264 1021

John.deane@abmission.org.au