



## Privacy Policy

**Approved by the Board on:** 8 December 2018 (reviewed in March 2024 with Title changes)

**Managed on behalf of the Board and ED by:** Head of Fundraising & Innovation

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### 1. Introduction

This document describes ActionAid Australia's Privacy Policy and reinforces its commitment to protecting personal information in accordance with the Australian Privacy Principles as set out in the *Privacy Act 1988* (Cth). ActionAid Australia will only gather personal information where it is necessary for one or more of its functions or activities. This policy applies to all personal information collected by ActionAid Australia other than personal information of current and former employees of ActionAid Australia where the personal information is held in employee records or its use and disclosure relates to the employment relationship.

### 2. Definitions

**Personal Information** means information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable. **Sensitive Information** is a subset of Personal Information. It includes information or opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record or health information about an individual.

### 3. Information collected by ActionAid Australia

ActionAid Australia collects different types of Personal Information depending on the purpose of collection.

ActionAid Australia may collect the following Personal Information from supporters:

- name, address, and contact information;
- interest in ActionAid Australia's programs;
- credit card or bank account details; and
- other information relating to personal circumstances, demographics or preferences.

ActionAid Australia may collect the following personal information from employees, volunteers, contractors, job applicants and workers:

- name, address, occupation, professional memberships and contact information;
- date of birth;
- bank account details;
- taxation information such as tax file numbers and HECS information;
- work permission documentation;
- work history;
- health history in some circumstances;
- emergency contact details;
- references; and
- superannuation information.

An individual does not have to provide Personal Information to ActionAid Australia, but it may be difficult for ActionAid Australia to comply with its obligations without the information. For example, without Personal Information ActionAid Australia may not be able to issue the individual with a receipt.

Where possible, an individual may interact with ActionAid Australia anonymously or using a pseudonym. For example, if an individual contacts ActionAid Australia by telephone with a general question, ActionAid Australia will not ask that individual's full name unless it is needed to answer the question.

### **Collecting Sensitive Information**

Generally, ActionAid Australia does not collect Sensitive Information. However, ActionAid Australia may collect Sensitive

Information in certain circumstances, with consent or where it is required or authorised by law or a court/tribunal order.

### **Collecting Personal Information**

ActionAid Australia will generally only collect Personal Information from the individual concerned, unless it is unreasonable or impracticable to do so. This may be collected through means such as written correspondence, e-mails, telephone calls, conversations, in meetings or through ActionAid Australia's website.

ActionAid Australia may also use third party suppliers such as fundraising face-to-face and telemarketing agencies or campaigning and survey organisations to collect and update supporter details.

ActionAid Australia will also occasionally use third party suppliers to update or append information about supporters such as new addresses through the National Change of Address (NCOA) mail re-direction services by Australia Post or phone numbers or email addresses from other publicly available sources.

Other publicly available information available, such as in newspaper or magazine articles or online and social media resources may also be appended to supporter records.

At or before the time (or, if that is not practicable, as soon as practicable after) ActionAid Australia collects Personal Information, steps will be taken to ensure the individual is aware of the following:

- ActionAid Australia's identity and contact information;
- ActionAid Australia will collect or has collected the Personal Information and the circumstances of collection;
- this privacy policy contains information about how an individual is able to gain access to the Personal Information and to have it corrected;
- the purpose for which the Personal Information is or will be collected;

- to whom ActionAid Australia usually discloses Personal Information of the type collected;
- this privacy policy contains information about how the individual may make complaints and how ActionAid Australia will deal with the complaint;
- collection of the Personal Information is required or authorised by law or a court/tribunal order and details of the relevant law or order; and
- the main consequences (if any) if all or part of the Personal Information is not provided.

### **Personal Information provided to ActionAid Australia by another Individual**

If an individual provides Personal Information to ActionAid Australia about someone else he or she must ensure that he or she has the consent of the other person to disclose that Personal Information and that the other person is aware of this privacy policy.

### **Use of Personal Information**

ActionAid Australia does not sell Personal Information.

ActionAid Australia will disclose the purpose for which Personal Information will be used, at the time of collection.

ActionAid Australia will use Personal Information obtained for the primary purpose it was collected or a related purpose. Such purposes include:

- processing donations;
- issuing receipts;
- responding to comments and questions;
- providing information about our activities;
- requesting financial or other support;
- improving our website and other forms of communication;
- providing marketing material; and

- to process and respond to complaints.

ActionAid Australia will only use the Personal Information for other purposes if the individual's consent is obtained, or if ActionAid Australia is otherwise entitled to do so by law.

### **Disclosure of Personal Information**

Personal Information will only be disclosed to third parties in accordance with this privacy policy.

Personal Information may be provided to third parties where any functions or services relating to the purpose for which the Personal Information is collected are being outsourced or a person would reasonably expect ActionAid Australia to disclose it to a third party for a particular purpose. For example, ActionAid may disclose Personal Information to:

- service providers that host our website servers;
- marketing service providers; and
- professional advisors (such as accountants, auditors and lawyers).

ActionAid Australia may also disclose Personal Information if:

- an individual has consented to the disclosure; or
- it is required or authorised by or under an Australian law or a court/tribunal order.

ActionAid Australia does not directly disclose Personal Information to recipients located overseas.

### **4. Accuracy of information**

ActionAid Australia will take all reasonable steps to ensure that the Personal Information collected, used or disclosed is complete and up to date.

We request that if any Personal Information changes, individuals contact us as soon as possible using the contact details set out in this privacy policy. We will usually respond to a request to update Personal Information within 5 business days.

## 5. Security of Personal Information

ActionAid Australia takes reasonable steps to ensure that the Personal Information held is protected from misuse, interference and loss or unauthorised access, modification or disclosure. For example, staff and volunteers all sign confidentiality agreements as part of the HR manual and are given access only to databases, files and records required to complete their jobs or assignments.

ActionAid Australia's online donation forms are security encrypted using SSL encryption and any data transfers are done using encrypted and password protected files. However, no data transmission over the internet or information stored on servers accessible through the internet can be guaranteed to be fully secure. Individuals are advised not to send confidential information by e-mail, as e-mails may be accessed by people other than those for whom they are intended.

### Notification of breach

If there is an unauthorised access or disclosure or loss of Personal Information and such is likely to result in serious harm to an individual, ActionAid Australia will undertake appropriate investigative and remedial action and will comply with the Mandatory Notification Data Breach regime in Part IIIC of the Privacy Act to the extent applicable.

### Accessing Personal Information

If an individual wishes to access Personal Information held by ActionAid Australia, he or she should contact ActionAid Australia using the contact details set out in this privacy policy. ActionAid Australia will usually respond to a request to access Personal Information within 30 days.

Individuals may contact ActionAid Australia at any time if they wish to:

- change their Personal Information (for example address or telephone number);

- cancel some or all of the communications that ActionAid Australia provides (opt-out mechanisms are included on the majority of communications);
- request access to the information that ActionAid Australia holds about them; or
- request further information about ActionAid Australia's privacy policy.

ActionAid Australia is entitled to refuse a request to access Personal Information in particular circumstances (such as where providing access would be unlawful or would have an unreasonable impact on the privacy of other individuals).

If ActionAid Australia rejects a request for access, reasons for the decision will be given to the individual concerned.

Where the request is accepted, ActionAid Australia may charge a reasonable fee for providing access to the Personal Information.

### **Using Personal Information for marketing purposes**

ActionAid Australia may sometimes disclose names and addresses to third parties for the purpose of allowing them to market their products and services. Such disclosure will be subject to your express consent. Individuals are given the opportunity to opt out of such communications and can contact ActionAid Australia for further details.

### **Information collected using technology**

ActionAid Australia uses 'cookies' to anonymously track visits to the website and the documents that are downloaded in order to compile statistical information. If visitors prefer 'cookies' not to be used, they may adjust their browser to disable them.

While ActionAid Australia's website contains links to other sites, it does not have any control or responsibility for their content, privacy practices or business practices.

### **Maintenance of volunteer and supporter records**

ActionAid Australia will keep volunteer and supporter records for seven years from the date on which an entry is made

In the case of other records, such as taxation records, ActionAid Australia will maintain these records for a continuous period of seven years from the date the entry is made.

Supporter information is captured on ActionAid Australia supporter databases indefinitely.

### **Method of disposal of Personal Information**

All information of a private, personal or confidential nature must be disposed of by ActionAid Australia in a manner that ensures the privacy of the individual to whom it relates.

Destruction of information will usually be by shredding or secure disposal by registered waste contractors.

### **6. Access to this policy**

Individuals may obtain a copy of this policy by contacting ActionAid Australia or by accessing it from the ActionAid Australia website. It will also be communicated and discussed with all employees and contractors and made available to them.

### **7. Questions or complaints**

If an individual has further queries, problems, complaints, or would like to give ActionAid Australia feedback, they should contact the relevant privacy officer:

#### **Privacy Officer Supporter Data**

Head of Fundraising & Innovation

Telephone: 1300 66 66 72

E-mail: [info.au@actionaid.org](mailto:info.au@actionaid.org)

Postal Address: Locked Bag 5002 ROYAL EXCHANGE,  
NSW 1225

#### **Privacy Officer Employee Data**

Chief Operating Officer

Telephone: 1300 66 66 72

E-mail: [hr.au@actionaid.org](mailto:hr.au@actionaid.org)

Postal Address: Locked Bag 5002 ROYAL EXCHANGE,  
NSW 1225

If an individual wishes to make a complaint, he or she will need to provide ActionAid Australia with sufficient details as well as



supporting evidence or information. A copy of our Complaints Policy is available on our website or through the ActionAid Supporter Services Team. The privacy officer will investigate the issue and determine the steps to resolve the complaint. ActionAid Australia will contact the individual if additional information is required. Notice of the outcome of the investigation will be given to the individual in writing. If the individual is not satisfied with the outcome, he or she can contact the relevant privacy officer or the Office of the Australian Information Commissioner (for more information, see [www.oaic.gov.au](http://www.oaic.gov.au)).

## **8. Reviewing and monitoring this policy**

ActionAid Australia may review and change this policy from time to time. The amended Privacy Policy will apply whether or not ActionAid Australia has given specific notice of any change.

This policy will be monitored and reviewed in line with the process in the Policy Framework. The Head of Fundraising & Innovation, supported by the Chief Operating Officer, is responsible for managing and maintaining this policy.

Any updates/revisions to the policy must be endorsed by the Executive Director and Leadership Team before being submitted to the Board for their approval.

## REVISIONS TO THIS POLICY

Nature of Changes	Date on which Board Approved
Policy first developed	22 November 2012
<p>Policy updated to incorporate changes in Privacy Legislations as follows:</p> <ul style="list-style-type: none"> <li>(a) shortened definitions section;</li> <li>(b) removal of Legal Framework and National Privacy Principles section;</li> <li>(c) Strengthened collection, use and disclosure, access to and security of personal information sections;</li> <li>(d) Updated Privacy Officer roles – the Privacy Officer-Employee Data is now the COO and Privacy Officer-Donor Data is now the Head of Fundraising.</li> </ul>	23 October 2017
<p>Policy updated to incorporate changes as follows:</p> <ul style="list-style-type: none"> <li>a. Slight changes to wording for clarity.</li> <li>b. Revised definition of Personal information to match that definition set out in the <i>Privacy Act 1988 (Cth)</i>,</li> <li>c. Staff titles amended where changed during 2018 re-structure.</li> <li>d. Additional section added for notification of breaches due to new legislation introduced in February 2018.</li> </ul>	8 December 2018

Reviewed March 2024 by Ashurst in line with new legislation and no changes required.	March 2024
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