

## Privacy Policy

**Functional Area: Management**

**Date approved: 28 November 2024**

**Board Resolution: UWB20241128-20**

---

### 1 Context

UnitingWorld is the international aid and partnerships agency of the Uniting Church in Australia. This policy has been developed to set out our approach with regard to Personal Information and how we manage, secure and respect information entrusted to us.

In this policy, “we” refers to UnitingWorld and “you” refers to persons to whom the policy applies.

Your privacy is very important to us, and we are committed to using your Personal Information responsibly. The Privacy Act 1988 (Cth) (“Privacy Act”) and the [Australian Privacy Principles](#) (“APPs”), the Australian Council for International Development ([ACFID](#)) [Code of Conduct](#) and the [Payment Card Industry Data Security Standard](#) (PCI DSS) all apply to us and guide us when we manage your Personal Information.

### 2 Scope

This Privacy Policy sets out how we manage Personal and Sensitive Information, including in relation to our website located at [www.unitingworld.org.au](http://www.unitingworld.org.au) (“Website”), and what to do if you have questions, concerns or complaints.

All UnitingWorld personnel (staff, Board members and volunteers) working within Australia must follow this policy. For overseas partners, this policy is considered best practice guidance. UnitingWorld will work with partners to build their capacity to manage and store information responsibly.

This policy applies to any individual from whom Personal Information has been collected by UnitingWorld, except to the extent that any such Personal Information is exempt under the Privacy Act 1988.

“Personal Information” is defined under the Privacy Act as any information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not.

“Sensitive information” is a subset of personal information and is defined under the Privacy Act as:

- information or an opinion (that is also personal information) 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 orientation or practices, or
  - criminal record
- health information about an individual
- genetic information

- biometric information that is to be used for the purpose of automated biometric verification or biometric identification, or
- biometric templates.

### 3 Policy Commitments

At UnitingWorld we are committed to taking all reasonable steps to protect all Personal or Sensitive Information in our possession.

**Principle 1:** We will only collect information that is useful for our mission and/or support our activities.

**Principle 2:** We will only use information in ways that we have consent to do so.

**Principle 3:** We will manage information responsibly and securely.

**Principle 4:** We will not share information without consent, unless legally required to do so.

**Principle 5:** We will respect an individual's right to access, update, correct, or remove information.

**Principle 6:** We will respond to feedback and complaints.

### 4 Policy implementation

#### 4.1 Your Personal Information

Personal Information we collect about you may include, but is not limited to:

- Name
- Address (both mailing and/or street address)
- Date of Birth
- Gender
- Email Address
- Phone Number
- Financial Information (e.g. bank account or credit card details) of our supporters
- Records of supporter's donation history
- Records of emails, letters and other interactions with UnitingWorld
- Employee record information
- Resumes and references, and bank account details for payment if you apply to work or volunteer with us
- Passport details if you are likely to travel internationally for UnitingWorld

You do not need to provide us with your Personal Information, and it's your choice how much information you provide. Where possible, we will give you the option to interact with us anonymously, if it is lawful and practical to do so. However, if you choose not to provide us with your Personal Information, we may not be able to provide you with quality services or otherwise interact with you, including our ability to limit communications according to your preferences.

You can set your own preferences for how you will hear from us by contacting us - <https://unitingworld.org.au/contact-us/>

## **4.2 Why do we collect your Personal Information**

The Personal Information UnitingWorld collects about you depends on what is reasonably necessary in relation to the nature of your dealings with us or what you choose to share with us; to carry out our functions and activities; and to assess and manage the needs of the people and organisations we work with.

If you are a supporter, we collect Personal Information to meet your expectations, including for the purpose of processing your donations, subscriptions, or change of details; and to tell you about our work and about opportunities to take action including through campaigns or appeals. 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 UnitingWorld, as well as details you may choose to provide about your values, interests and beliefs.

Where we collect your Personal Information for a specific purpose not outlined above, we will explain 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.

## **4.3 How we collect your Personal Information**

There are several ways in which UnitingWorld collects data. We collect your Personal Information only by lawful, fair and reasonable means. In some circumstances we may be provided with your Personal Information by third parties. However, we primarily collect your Personal Information directly from you when you:

- interact with us in person
- interact with us over the phone
- interact with us online or via email
- participate in surveys or questionnaires
- interaction with UnitingWorld's websites
- subscribe to our mailing list
- donate to UnitingWorld
- attend a UnitingWorld event or an event where UnitingWorld has a presence
- engage with our staff or volunteers
- or from other publicly available sources.

In the event someone makes a donation to UnitingWorld on your behalf, and asks that you receive information about their gift, we will collect the Personal Information they provide about you.

## **4.4 How we use your Personal Information**

UnitingWorld collects your Personal Information for various purposes that support the continuation and development of our services, including:

- to maintain contact with you
- to process and receipt any donations you make to UnitingWorld
- to provide you with information you request from us
- to provide you with updates on our programs and initiatives including via newsletters, emails, SMS and phone calls (unless you opt-out of receiving such information)
- to request financial, campaigning, volunteering or other support
- measure the level of support received and the effectiveness of our campaigns

- to improve the quality of the programs and services we offer
- to respond to any questions, comments, compliments or complaints you may have
- managing volunteers, employees, contractors, and consultants
- for marketing and research purposes
- any other purposes identified at the time of collecting your information
- for governance and compliance purposes including managing any quality, conduct or risk management issues
- for meeting legal and regulatory obligations
- the general management and conduct of UnitingWorld.

Additionally, we may also use non-personal, de-identified and grouped information for various purposes such as data analysis, research, and promotional purposes. Any results are anonymised or combined to ensure that no Personal Information or information relating specifically to you is reasonably identifiable.

We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure.

#### **4.5 Sensitive Information**

Under certain circumstances, UnitingWorld may need to collect Sensitive Information about you. This might include any information or opinion about your racial or ethnic origin, political opinions, political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record, Working with Children Checks (WWCC), National Police Checks or health information. If we collect your Sensitive Information, we will do so only with your consent, unless required to under the APPs or to otherwise meet our legal obligations.

Sensitive Information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law.

#### **4.6 Security of Your Personal and Sensitive Information**

UnitingWorld is committed to taking all precautions considered necessary to ensure any physical or electronic Personal or Sensitive Information is safely secured and guarded from misuse, loss or unauthorised access. We maintain strict security measures to ensure your information is protected including, but not limited to, the following practices:

- restricting access to Personal Information to authorised personnel only
- limited access to offices by authorised personnel only
- secure storage for hard copy files
- implementing multi-factor authentication across software, hardware and applications
- utilising end-to-end encryption technologies across software and applications
- utilising secure firewalls to protect against unauthorised access
- engaging and using only reputable and secure online payment systems
- providing ongoing training to personnel on privacy and security practices
- conducting regular audits to monitor and control Personal Information access.

Additionally, we also have policies and procedures in place to guide our approach to records management including the retention and disposal of Personal Information. When your Personal Information is no longer necessary for us to use for its primary purpose or for another closely relevant

purpose we will take reasonable steps to destroy or permanently de-identify your Personal Information.

### **Third Parties**

We may disclose your Personal Information to third parties, in accordance with this Policy, in circumstances where you would reasonably expect us to disclose your information. We will take reasonable steps to ensure that contracts with third parties include requirements for third parties to comply with the Use and Disclosure requirements of the Privacy Act 1998. For example, we may disclose your Personal Information to reputable third parties we engage with who assist us with our fundraising, programmatic and operational activities, such as:

- Our Information Technology providers
- Our marketing partners
- Our mail house partners
- Our professional services advisors
- Our payment processing providers
- Your financial institution in the case of direct debit or credit card transaction issues.

Additionally, UnitingWorld may also engage third party agencies to support our fundraising activities. These third-party agencies may also collect your Personal Information directly from you when provided. At any time, you may contact us to cease receiving direct marketing communications from us.

Some third-party service providers we disclose Personal Information to, such as cloud service providers, may be based in or have servers located outside of Australia. Where we disclose your Personal Information to third parties overseas, we will take reasonable steps to ensure that data security and appropriate privacy practices are maintained. We will only disclose to overseas third parties if:

- you have given us your consent to disclose Personal Information to that third party; or
- we reasonably believe that:
  - the overseas recipient is subject to a law or binding scheme that is, overall, substantially similar to the APPs; and
  - the law or binding scheme can be enforced; or
- the disclosure is required or authorised by an Australian law or court order.

### **4.7 Disclosing Your Personal Information**

Unless required to by law, UnitingWorld will, under no circumstances, rent, sell or exchange your Personal Information without your consent.

### **4.8 Our Website and Social Media Platforms**

To enhance user experiences and improve our services, UnitingWorld's website utilises third-party cookies. These cookies assist us in improving user experience. Personal Information is not disclosed. You may disable cookies at any time by adjusting your browser and/or device settings.

Across our social media platforms, we also use a wide range of widgets and applications that enable information sharing, subject to the privacy policies of the relevant business providing the widget or application. It is important to note that Personal Information shared by you on social media features may be visible to other users, with limited control from our end.

Additionally, UnitingWorld also uses analytic cloud services, such as Google Analytics, across our website and social media platforms. While this data is mostly anonymous, it is possible that we may connect certain activities to individuals.

#### **4.9 Children and Young Persons**

UnitingWorld is dedicated to safeguarding the privacy of children and young persons, particularly in an online environment. In the event Personal Information related to a child or young person comes to our attention, unless associated with an adult engaged in our programs, and with their consent, any information will be de-identified and destroyed immediately. Additionally, we will never knowingly collect Personal Information from individuals under the age of 18 years without prior consent from a parent or guardian.

#### **4.10 Accessing and Updating your Personal Information**

You have the right to access, update, correct, or remove your Personal Information at any time. To do so, please contact us in writing by emailing your request to [info@unitingworld.org.au](mailto:info@unitingworld.org.au).

All requests for access or updates to your Personal Information will be free of charge. For security purposes, you will be required to verify your identity before any Personal Information is disclosed. If your Personal Information has been corrected and was previously disclosed to third parties by us, you can request that we notify those third parties of the correction.

Requests will be responded to within 30 days, unless it is unreasonable or impracticable to do so. All reasonable steps to comply with a request will be made, unless there is a need to keep information for legal, auditing or internal risk management reasons. If we refuse to give access to, update, correct, or remove your Personal Information, we will provide you written notice with our decision and our reasons where it is reasonable to do so. We will also provide the mechanisms of complaint available to you, including those in this Privacy Policy or otherwise.

#### **4.11 How Long Will We Keep Your Personal Information**

We will keep your personal information, unless you advise otherwise, in accordance with the Australian Privacy Principles and all other laws and regulations that govern us.

If you request us to delete your personal information, we will investigate your enquiry and, where possible, action it, subject to any legal or safeguarding requirements we may have to keep your information. If information cannot be deleted, we will respect your wishes not to be contacted and archive your information in a secure manner until requirements to store this information are met.

#### **4.12 Breaches of privacy**

In the event of there being a data breach involving Personal or Sensitive Information, we follow our incident response policies and procedures to ensure we meet all requirements under the Privacy Act.

#### **4.13 Feedback and Complaints**

UnitingWorld is committed to safeguarding the privacy and security of its supporters and program participants. If you wish to make a complaint or provide feedback about our privacy practices, or about a breach of the APPs established under the Privacy Act, please contact us at [complaints@unitingworld.org.au](mailto:complaints@unitingworld.org.au), or via one of the additional mechanisms outlined on our website: <https://unitingworld.org.au/complaints>.

Your feedback is important to us, and we will endeavour to reply to you within 30 days of receipt.

We expect that we can mutually resolve your matter, however if you are not satisfied with our response, you may refer your matter to the Australian Information Commissioner. For more information, please visit [www.oaic.gov.au](http://www.oaic.gov.au).

#### 4.14 How to Contact Us

If you have any questions in relation to this Privacy Policy or our handling of your Personal Information, please contact us at:

Phone: 1800 998 122

Email: [info@unitingworld.org.au](mailto:info@unitingworld.org.au)

Post: PO Box A2266, Sydney South NSW 1235

## 5 Roles and Responsibilities

Key safeguarding responsibilities for specific roles within UnitingWorld.

The Board will:

- Demonstrate commitment to a culture of protecting privacy and leading by example
- Approve this policy and hold the National Director and executive team accountable to how effectively this policy is implemented

The National Director and executive team will:

- Demonstrate a commitment to a culture of protecting privacy and leading by example
- Ensure our procedures, practices, and operations align with this policy
- Report to the Board and Committees on policy matters
- Ensure staff are aware of this policy and understand their responsibilities
- Ensure supporter, staff, volunteer and contractor data is managed in accordance with this policy
- Handle complaints and incidents as per our policy
- Informing the Board of any concerns relating to complaints that may present risk to UnitingWorld or its personnel
- Report data breaches as required by law

The Head of Operations will manage in accordance with this policy:

- Use of third party providers related to business operations

The Head of Fundraising and Communications will manage in accordance with this policy:

- Use of third party providers related to fundraising and communications
- UnitingWorld websites and social media
- Use of supporter stories, videos and images in our fundraising and communications

The Head of Programs will:

- Use of third party providers related to programs
- Support partners to meet best practice privacy standards

Staff will need to:

- Understand and follow this policy and related procedures
- Report any breach of this policy to the National Director and/or Head of Operations

## 6 Related Resources

UnitingWorld's commitment to privacy across the agency and its work are implemented through a suite of policies and other relevant documents, including:

- Professional Conduct Policy
- Communication and Transparency Policy
- Complaints and Incident Handling Policy

- Safeguarding and Protection Policy (Including Child Protection)
- Professional Conduct Policy
- UnitingWorld Code of Conduct
- Related Cyber policies

## 7 Review Schedule

**Date of next review:** November 2027 (or as additional changes are made to Privacy Act). Any changes to this policy will be updated on our website.