Privacy Policy

Functional Area: Management
Date approved: 3 March 2025
Board Resolution: UWB20250303-1

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 to Personal Information and how we collect, use, disclose and respect information entrusted to us.

In this policy, "we" refers to UnitingWorld and "you" refers to persons whose Personal Information this policy covers.

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"), apply to us and guide us when we manage your personal information.

2 Scope

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

This policy applies to all Personal Information collected and stored by UnitingWorld. All UnitingWorld staff, Board members and volunteers working within Australia must follow this policy.

This policy is relevant to any individual from whom Personal Information has been collected by UnitingWorld.

"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.

Examples of personal information are listed in Section 4.1

"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 reasonably necessary for our mission and/or to support our activities and functions.

Principle 2: We will only collect Sensitive Information with your consent.

Principle 3: We will only use Personal Information for the purposes for which we collected it or in other ways that we are permitted to do so.

Principle 4: We will manage Personal Information responsibly and securely.

Principle 5: We will not share Personal Information without consent, unless legally required to do so.

Principle 6: We will respect an individual's right to access, update, or correct their Personal Information and respond to relevant 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 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.

4.3 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 for the purpose of processing your donations, subscriptions, or change of details; and to tell you about our work, and about opportunities to act 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 religious beliefs. You may opt out of receiving marketing information by notifying us accordingly, or by using any unsubscribe facility we provide for that purpose.

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

4.4 How we collect your Personal Information

There are several ways in which UnitingWorld collects Personal Information. 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, for example if you are named in a will in which UnitingWorld is also a beneficiary, or if we are conducting marketing research or surveys. 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 donates to UnitingWorld on your behalf, and asks that you receive information about their gift, we will collect the Personal Information they provide about you.

4.5 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
- for 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.

4.6 Security of Your Personal Information

UnitingWorld is committed to taking all precautions considered necessary to ensure any physical or electronic Personal Information is safely secured and guarded from misuse, loss or unauthorised access. We maintain strict security measures to ensure your personal 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.We may disclose your Personal Information to third parties with whom we engage to 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

We will take reasonable steps to ensure that contracts with third parties include requirements for third parties to comply the Privacy Act.

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 to whom we disclose Personal Information, such as cloud service providers, may be based in or have servers located outside of Australia. Due to circumstances which change from time to time it is not practicable for us to specify the countries in which such third parties are located. 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.

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

4.7 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. Please note that rejecting cookies may mean that some or all of the functions on our website will not be available to you.

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.

Sometimes our websites contain links to other websites. When you access a website other than our websites, we are not responsible for the privacy practices of that site. We recommend that you review the privacy policies of each website you visit.

4.8 Children and Young Persons

UnitingWorld is dedicated to safeguarding the privacy of children and young persons. We will never knowingly collect Personal Information from individuals under the age of 18 years without prior consent from a parent or guardian.

4.9 Accessing and Updating your Personal Information

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

All requests for access or updates or corrections 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 of 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.

4.10 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.

4.11 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, 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 acknowledge all complaints within two 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 Office of the Information Commissioner. For more information, please visit www.oaic.gov.au.

4.12 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

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 management accountable to how effectively this policy is implemented

The National Director and management 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

- Manage third party providers in accordance with this policy
- Ensure staff are aware of this policy and understand their responsibilities
- Ensure all Personal Information (eg 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

Staff will need to:

- Understand and follow this policy and related procedures
- Report any breach of this policy as an incident

6 Policy Review Schedule

Any changes to our policy will be updated on our website.