

PO-4.5: PRIVACY POLICY

1. Purpose

The purpose of this policy is to state Anglican Aid's compliance with the Privacy Act 1988 (Cth).

2. Scope

This policy applies to all employees and volunteers as a minimum standard.

3. Definitions

Term	Description
Donor	A person who has made a gift to Anglican Aid; or has asked to be included on our donor database.
Personal Information	Means information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion. ¹

4. Policy Statement

Anglican Aid is committed to protecting and securing the privacy and confidentiality of our supporters and those partners it assists both in Australia and overseas.

Anglican Aid is bound by privacy requirements as a result of amendments to the Privacy Act 1988. In particular, Anglican Aid must adhere to the National Privacy Principles (NPPs) in relation to collecting, using, disclosing, securing and allowing access to supporter's and partner's personal information.

This Policy will be made available to the Public.

5. Guidelines

5.1 Personal Information

Personal information held by Anglican Aid may include:

- name
- contact details (address, phone, fax, email)
- bank account or credit card details if provided
- donation history.

Sometimes Anglican Aid may ask for more detailed or sensitive information such as the person's associations with churches.

If the Donor chooses not to provide us with contact details when they send a gift to Anglican Aid, then we cannot send an official tax-deductible receipt (if the gift is for our tax-deductible funds) and letter of thanks.

Anglican Aid will only collect and store people's payment card information in compliance with the Payment Card Industry Data Security Standard.

5.2 How We Collect Personal Information

Anglican Aid usually collects personal information directly from the person, when they provide it over the phone, website or on a donation coupon when making a gift to Anglican Aid.

Other sources would only include publicly available sources of information. Please note that Anglican Aid does not buy mailing/data lists nor does Anglican Aid "sell" such lists.

5.3 How We Use Personal Information

Personal information may be used to:

- process any donations sent to Anglican Aid;
- send receipts to the Donor; and
- send to the person information about Anglican Aid including newsletters, updates and information on appeals.

Donors can elect not to receive further information from Anglican Aid by advising Anglican Aid either in writing or by phone.

If Anglican Aid uses personal information in ways other than as stated in this policy, Anglican Aid will ensure that it complies with the requirements of Privacy law.

5.4 Disclosing your personal information

Anglican Aid will not disclose information about the Donor to any other organisation apart from outsourced providers such as:

- banking and payment card data processing (in the case of direct debit or some credit card transactions);
- mail delivery and sorting (including electronic);
- information storage;
- website usage analysis;
- legal, audit or accounting.

Anglican Aid takes reasonable steps to make sure that our agreements with service providers include appropriate privacy and confidentiality obligations.

Anglican Aid sometimes share non-personal, de-identified and aggregated information, for example, with research organisations such as universities.

5.5 Donor's Use of Others' Personal Information

In line with our commitment to value people and our obligations under the ACFID Code of Conduct, we expect Donors to help us by treating information about people in our field programs in accordance with our values and the ACFID Code of Conduct requirement to “act in ways that respect the dignity, uniqueness and intrinsic worth of every person”.

An important example of this is our commitment to honour the consent given by parents or community leaders for use of child and community images from our programs in the field. Sometimes this consent is quite limited, for example, to display such images on our website only.

5.6 Securing your information

We will take all reasonable steps to keep information we hold about Donors secure (whether electronic or in hard copy) and to keep this information accurate and up to date. This includes complying with the Payment Card Industry Data Security Standard, which covers security of payment card information. Our employees and service providers are also required to keep personal and payment card information confidential and secure.

It is our policy to:

- permanently de-identify personal information where reasonable and possible; and
- destroy personal information once there is no longer a legal or business need for us to retain it.

5.7 Accessing Donor's Own Information

Donors can access their information by asking us. All requests for access to personal information should be made by email, post or phone to the Executive Director.

Occasionally we may need to say no, for example, where granting the Donor access would infringe someone else's privacy.

When the Donor request access, we will ask the Donor to provide some form of identification (such as a driver's licence or passport) so we can make sure that the Donor is the person to whom the information relates.

5.8 Correcting Donor's Own Information Or Raising Concerns

If the Donor believes that the information Anglican Aid holds about them is incorrect or out of date, or if the Donor has concerns about how Anglican Aid are handling their personal information, then the Donor can contact Anglican Aid and we will try to resolve those concerns.

6. Related documents

Privacy Act 1988 (Cth)

7. Review

In order to ensure that this policy continues to be effective and applicable, the procedure will be reviewed on a two yearly basis. Conditions which might warrant a review of the procedure on a more frequent basis would include:

- Employee or management concern
- Changes to legislation
- Changes to ACFID/AusAID requirements

Following completion of any review, the policy will be revised/updated to correct any deficiencies if required and approved by the Anglican Aid Board. Any changes to the policy will be communicated to staff and partners.

ⁱ Privacy Act 1988 (Cth)