

Privacy Policy – Christians Against Poverty (Australia)

Reviewed September 2021

1. INTRODUCTION

Christians Against Poverty (referred to as 'we', 'our', 'us') is bound by the Privacy Act 1988 ('Privacy Act'), including the Australian Privacy Principles ('APPs') and recognises the importance of ensuring the confidentiality and security of your personal information. We are committed to maintaining a policy of strict confidence concerning your (you, your) personal information ("Policy").

This Policy has been developed in accordance with the Privacy Act and applies to the collection, storage, use and dissemination of your personal information. All third parties (including suppliers, sub-contractors, or agents) that have access to or use personal information collected and held by us must abide by this Policy. By accessing our website or otherwise transacting with us, you accept the terms of this Policy and consent to the collection, storage, use and dissemination of your personal information in accordance with this Policy and the Privacy Act.

Copies of this Policy are available free of charge by contacting our Privacy Officer (see details on page 7).

In this Policy:

- 'Disclosing' information means providing information to persons outside of us
- 'Personal information' means information or an opinion relating to an individual, which can be used to identify that individual
- 'Privacy Officer' means the contact person for questions or complaints regarding our handling of personal information
- 'Sensitive information' is personal information that includes information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences and criminal record, and also includes health information
- 'Use' of information means our use of information

2. WHAT KINDS OF PERSONAL INFORMATION DO WE COLLECT AND HOLD?

We may collect and hold a range of information about you to provide you with our services and/or maintain relationship and communications with you. The range of information may include:

- Full name
- Date of Birth
- The full names of dependants who live with you
- Employment details
- Contact information – including address, landline and mobile telephone numbers and email address

- Income and Centrelink payment details
- Bank account details

3. HOW DO WE COLLECT PERSONAL INFORMATION?

We generally collect personal information directly from you. For example, personal information will be collected through our application processes, forms and other interactions with you in the course of providing you with our services, including when you visit our website, call us or send us correspondence.

We may also collect personal information about you from a third party, such as

- A friend, relative or carer for whom you have given CAP a written and signed Third Party Authority to communicate with on your behalf
- A creditor for whom you have given CAP a written and signed Third Party Authority to communicate with on your behalf

If so, we will take reasonable steps to ensure that you are made aware of this Policy.

We may also use third parties to analyse traffic at our website, which may involve the use of cookies. Information collected through such analysis is anonymous. A cookie assists us to store information on how visitors to our website use it and the pages that may be of most interest. If you choose, you are able to configure your computer so that it disables cookies or does not accept them.

We will not collect sensitive information about you without your consent unless an exemption in the APPs applies. These exceptions include if the collection is required or authorised by law or necessary to take appropriate action in relation to suspected unlawful activity or serious misconduct. We may collect voice or biometric information to verify your identity.

If you do not provide us with the personal information we request, we may not be able to provide you with our services or meet your needs appropriately.

We do not give you the option of dealing with us anonymously or using a pseudonym. This is because it is impractical for us to deal with individuals who are not identified. The exception to this is someone wishing to make a one-off financial support donation anonymously.

4. UNSOLICITED PERSONAL INFORMATION

We may receive unsolicited personal information about you. We destroy or de-identify all unsolicited personal information we receive unless it is relevant to our purposes for collecting personal information. We may retain additional information we receive about you if it is combined with other information we are required or entitled to collect. If we do this, we will retain the information in the same way we hold your other personal information.

5. WHO DO WE COLLECT PERSONAL INFORMATION ABOUT?

The personal information we may collect and hold includes (but is not limited to) personal

information about the following individuals:

- potential clients of our Debt Help service following a call to our 1300 number
- clients of our Debt Help service
- participants of our CAP Money service
- supporters who make financial donations to CAP
- visitors to our website who communicate with us via the website
- service providers or suppliers

6. WHY DO WE COLLECT PERSONAL INFORMATION?

We collect and hold personal information about you so that we may:

- provide you with our services
- review and meet your ongoing needs
- provide you with information we believe may be relevant or of interest to you
- let you know about other services we offer, send you information about and invitations to CAP events, send you information about opportunities to support CAP
- consider any concerns or complaints you may have
- comply with relevant laws, regulations and other legal obligations
- help us improve the services offered to our supporters and clients

We may use and disclose your personal information for any of these purposes. We may also use and disclose your personal information for secondary purposes which are related to the primary purposes set out above or in other circumstances authorised by the Privacy Act.

Sensitive information will be used and disclosed only for the purpose for which it was provided (or a directly related secondary purpose) unless you agree otherwise or an exemption in the Privacy Act applies.

7. WHO DO WE DISCLOSE PERSONAL INFORMATION TO?

We may disclose personal information to:

- a related entity of us
- an agent, professional advisor or service provider we engage to carry out our functions and activities, such as:

- Mailing house
- Accountants who conduct our annual audit
- Professionals conducting a compliance audit
- financial institutions involved in managing payments on your behalf, such as banks
- anyone whom you authorise us to disclose it

If we disclose your personal information to service providers that perform business activities for us, they may only use your personal information for the specific purpose for which we supply it. We will ensure that all contractual arrangements with third parties adequately address privacy issues and will make third parties aware of this Policy.

8. SENDING INFORMATION OVERSEAS

We are likely to disclose your personal information to recipients located in the following countries:

- **England**
 - Limited **client** information (Full name, address and contact detail), used for the initial client appointment process, is stored on CAP UK servers. This information is de-identified after 12 months.
 - CAP Money database and budget tools are stored on CAP UK servers.
 - A copy of CAP Australia's **client & supporter** databases, hosted in Australia, is available to systems developers at CAP UK headquarters for development and testing purposes.
 - Stringent privacy legislation requirements are in force in England and CAP UK have rigorous systems in place to protect personal information in accordance with Australian Privacy Principles.

We will not disclose your personal information to overseas recipients without your consent unless:

- we have taken reasonable steps to ensure that the recipient does not breach the Privacy Act, or the APPs; or
- the recipient is subject to a similar information privacy regime.

9. MANAGEMENT OF PERSONAL INFORMATION

We recognise the importance of securing the personal information of our clients and supporters. We will take steps to ensure your personal information is protected

from misuse, interference or loss, and unauthorised access, modification or disclosure.

Your personal information is generally stored in our computer databases. Any paper files are stored in secure areas. In relation to information that is held on our computer databases, we apply the following guidelines:

- strong passwords are required to access the system
- passwords expire and need to be reset after a set period (on the client database)
- we change employees' access capabilities when they are assigned to a new position
- employees have restricted access to those sections of the system required to perform their duties
- the system automatically logs unauthorised access attempts
- unauthorised employees are barred from updating and editing personal information
- all computers which contain personal information are secured electronically
- data is encrypted during transmission over the network
- print reporting of data containing personal information is limited
- employees are bound by internal information security policies and are required to keep information secure; all employees are required to complete training about information security
- we regularly monitor and review our compliance with internal policies and industry best practice

10. DIRECT MARKETING

We may only use personal information we collect from you for the purposes of direct marketing without your consent if:

- the personal information does not include sensitive information; and
- you would reasonably expect us to use the information for the purpose of direct marketing; and
- we provide a simple way of opting out of direct marketing
- you have not requested to opt out of receiving direct marketing from us

We will not collect information from third parties for the purpose of Direct Marketing.

We will not disclose your information to third parties for the purpose of facilitating directmarketing by other organisations.

11. IDENTIFIERS

We do not adopt identifiers assigned by the Government (such as driver's licence numbers) for our own file recording purposes, unless one of the exemptions in the Privacy Act applies.

12. HOW DO WE KEEP PERSONAL INFORMATION ACCURATE AND UP TO DATE?

We are committed to ensuring that the personal information we collect, hold, use and disclose is relevant, accurate, complete and up to date.

We encourage you to contact us if any personal information we hold about you needs to be updated. If we correct information that has previously been disclosed to another entity, we will notify the other entity of the correction within a reasonable period. Where we are satisfied information is inaccurate, we will take reasonable steps to correct the information within 30 days, unless you agree otherwise. We will not charge you for correcting your personal information.

13. RISKS OF USING THE INTERNET

You should note that there are inherent security risks in transmitting information through the internet. You should assess these potential risks when deciding whether to use our online services. If you do not wish to transmit information through our website, there are other ways in which you can provide this information to us. You can, for example, contact us by phone, fax or in writing.

14. ACCESSING YOUR PERSONAL INFORMATION

Subject to exceptions in the Privacy Act, you can access the personal information that we hold about you by contacting CAP's Privacy Officer. We will generally provide access within 30 days of your request. If we refuse your request, we will provide you with written notice and explain the reasons for the refusal and your options to advance your request.

We will require identity verification and specification of what information is required. An administrative fee for search and photocopying costs may be charged.

15. UPDATES TO THIS POLICY

This Policy will be reviewed from time to time to take account of new laws and technology, and changes to our operations and the business environment.

16. OUR RESPONSIBILITIES

It is the responsibility of management to inform employees and other relevant third parties about this Policy. Management must ensure that employees and other relevant third parties are advised of any changes to this Policy. All new employees are to be provided with timely and appropriate access to this Policy, and all employees are provided with training in relation to appropriate handling of personal information. Employees or other relevant third parties that do not comply with this Policy may be subject to disciplinary action.

We may vary the terms of this Policy at any time and we will take reasonable steps to inform you of any updates to this Policy. You will be deemed to have consented to any such updates by your continued use of our services following any such update.

17. REMOVAL OF PERSONAL INFORMATION FROM CAP'S DATABASE

CAP is required to keep information for a statutory period. Personal information contained in records will be de-identified as follows:

- Potential clients who do not activate their account – 1 year following the final interaction with CAP
- Clients – 7 years from the last interaction with CAP
- Supporters - 7 years from the last interaction with CAP

If we no longer need your personal information, unless we are required by law to retain it, we will take reasonable steps to destroy or securely delete your personal information in accordance with our retention policy.

1. MAKING AN INQUIRY OR A COMPLAINT

If you have any questions about this Policy, or wish to make a complaint about how we have handled your personal information, you can lodge an enquiry or complaint with us by:

- Telephoning: 1300 227 000 (ask to speak with CAP's Privacy Officer)
- Writing to: Privacy Officer
Christians Against
Poverty, PO Box 298
Hunter Region Mail Centre NSW 2310
- Emailing: privacy@capaust.org

If you are not satisfied with our response to your complaint, you can also refer your complaint to the Office of the Australian Information Commissioner by:

- Telephoning: 1300 363 992

- Writing: Director of Complaints
Office of the Australian Information
CommissionerGPO Box 5218, SYDNEY NSW
2001
- Emailing: enquiries@oaic.gov.au