Appendix 16. Privacy Policy

(Next review by July 2029)

Policy number	16	Current policy version	3
Original policy approved	July 2020	Previous review date	June 2026
Current policy reviewed by CEO	CC	Current version approved by Committee of Management on	July 2026
Responsible person	CEO	Scheduled review date by	July 2029

Introduction

Assisi Aid Projects (Assisi) is committed to protecting the personal information and privacy of all those who come into contact with the organisation. This privacy statement describes how Assisi collects and manages personal information in the course of its business operations including through its website at www.assisi.org.au.

Purpose and Principles

The purpose of this policy is to describe how Assisi collects personal information, who may have access to it and how it may be used. This policy forms part of our transparent and accountable governance structure.

Australian Privacy Principles

Assisi complies with the *Privacy Act (1988)* and the applicable Australian Privacy Principles under that Act in Australia:

Principle 1: Open and transparent management of personal information

Principle 2: Anonymity and pseudonymity

Principle 3: Collection of solicited personal information

Principle 4: Dealing with unsolicited personal information

Principle 5: Notification of the collection of personal information

Principle 6: Use or disclosure of personal information

Principle 7: Direct marketing

Principle 8: Cross border disclosure of personal information

Principle 9: Adoption, use or disclosure of government related identifiers

Principle 10: Quality of personal information

Principle 11: Security of personal information

Principle 12: Access to personal information

Principle 13: Correction of personal information

Assisi also complies with the *Payment Card Industry Data Security Standard* (PCI DSS).

Scope

This policy applies to all of Assisi's staff, members, Governing Body members, volunteers, representatives, contractors, and visitors to project sites (collectively referred to as "personnel" in this document) and applies to the personal information collected from participants, implementing partner organisations, contractors, donors, members of the public, and Assisi personnel.

The primary purpose for Assisi to collect personal information is to inform supporters and donors about its work, and process donations.

The primary purpose for Assisi's implementing partners to collect personal information from individuals is to provide services to women and children in the Asia Pacific including planning, funding, monitoring and evaluating services. The kind of information collected will depend on the type of relationship the individual has with Assisi (client, donor, business partner, employee, volunteer, contractor, member or online user of the Assisi website).

Personal information is any information or opinion that identifies an individual.

Personal information provided to Assisi will be stored, used and shared only in accordance with and for the purposes specified in this Privacy Policy. There is no requirement to provide personal information to Assisi, but Assisi may not be able to offer services or provide a response without the relevant personal information.

Assisi may change its Privacy Policy from time to time and will publish those changes on its website.

Policy

<u>Collection, Use and Disclosure of Personal Information</u>

Personal information means names and addresses, bank account details or credit card information, dates of birth, telephone numbers, email addresses, correspondence, information from previous employers, and any other information that may have been submitted in hard copy, online forms or interactions. It also includes other information about a person's history with, or relationship to Assisi Aid Projects, where the information identifies them.

Assisi collects personal information primarily for the following purposes: to enable access and use of the Assisi website, to process donations and sponsorships including the issuing of receipts and donation statements, sending marketing and promotional information, seeking continued support from donors and sponsors, responding to questions and obtaining feedback, reporting to government and other funding bodies how funding is

used, meeting legal and compliance obligations, and considering employee or volunteer applications.

Assisi's implementing partners collect information on its behalf, including participant demographic information, and case studies and photos with informed consent. This enables Assisi and its partners to better deliver and analyse the effectiveness of programs. Assisi requires implementing partners to adhere to their national laws and regulations as set out in all Memorandum of Understandings.

Personal information may only be disclosed for the purposes described in this Privacy Policy. Assisi may disclose personal information to employees and volunteers, third party suppliers, payment system operators, contractors, and specific third parties authorised by the individual to receive information held by Assisi.

Assisi does not disclose personal information without permission unless the disclosure is either in accordance with this policy or unless it is required or authorised by law.

Management and Security of Personal Information

Assisi will take all reasonable steps to ensure that the personal information it collects, uses, retains or discloses is accurate and up to date, and is protected from misuse, loss, unauthorised access or disclosure.

Assisi Website Provider

Data may be available to Assisi's website provider to enable the delivery of their service, to carry out analysis and research on demographics, interests and behaviour of users and supporters, to help gain a better understanding to enable Assisi to improve services. This may include connecting data Assisi receives on the website to data available from other sources. Identifiable data will only be used where it is necessary for the analysis required, and where interests for privacy are not deemed to outweigh their legitimate interests in developing new services for us. In the case of this activity the following will apply:

- Data will be made available to Assisi's website provider who may have their own privacy policy or guide.
- The data that may be available to them includes any of the data collected as described in this privacy policy.
- They will store data for a maximum of seven years.
- This processing does not affect any of the rights as detailed in this Privacy Policy.

Use or Disclosure of Information

Assisi Aid Projects may use the personal information uploaded or submitted via the website to:

- Make contact – either in response to a query or suggestion, or to mail newsletters, documents, publications, etc.
- Manage and process a job application.
- "Remember" online profile and preferences.
- Help website users quickly find information that is relevant based on interests, and help Assisi create relevant and interesting site content.
- Undertake statistical analysis.

Website Usage Data

In general, the Assisi website can be browsed without revealing any personal information. Assisi's website provider may gather information during general browsing from standard server logs. These include Internet Protocol (IP) addresses, domain names, browser types, operating systems, and information such as referring websites, files downloaded, pages visited, and dates and times of those visits.

Access to Personal Information

An individual may request access to, and seek correction of personal information held by Assisi, make a complaint in relation to a breach of privacy, query or raise a concern about this Privacy Policy.

This can be done by contacting Assisi in writing at assisi@assisi.org.au or by letter to the Chief Executive Officer at Assisi Aid Projects, Ross House, 247-251 Flinders Lane, Melbourne 3000.

Privacy complaints will be treated seriously, responded to promptly, and dealt with confidentially following verification of identity. The CEO will investigate the complaint and inform the complainant of the outcome within a reasonable time following the process outlined in the Assisi Aid Projects Complaints procedure. If the complaint is concerning the CEO, the President of the Committee of Management can be contacted at elizabeth.morris@assisi.org.au.

If not satisfied with the outcome of the complaint, the matter can be referred to the Office of the Australian Information Commission:

Assisi Contact Details

CEO
Assisi Aid Projects
Ross House
247-251 Flinders Lane
Melbourne 3000.
assisi@assisi.org.au

Office of the Australian Information Commissioner
GPO Box 5288
Sydney NSW 2001
1300363992

To contact the OAIC about general enquiries or to make a complaint, visit the OAIC website and fill in the appropriate form: www.oaic.gov.au/contact-us