

## PRIVACY POLICY

This statement sets out the privacy policy and the practices that will be followed in respect to the privacy of individuals who participate in and support the activities of Scripture Union Northern Territory (SU). This statement reflects the Privacy Act and the National Privacy Principles (NPP's) that are set out in the Act.

### 1. Collection of Information

#### 1.1 Introduction

SU collects information from:

- Active, past and potential volunteers;
- Potential and prospective employees;
- Donors, sponsors, supporters, staff, volunteers and participants of SU Western Australia activities;
- Parents/guardians of participants in SU activities;
- Retail customers.

#### 1.2 Personal Information

The type of personal information collected, used, and stored by SU regarding individuals generally includes the following:

- Names;
- Addresses (including email addresses);
- Telephone and facsimile numbers;
- Date of Birth;
- Gender;
- Nationality;
- Education and training;
- Details about next of kin including spouse, parent's and children's names;
- Occupation and employment history;
- Membership and professional associations;
- History of Involvement in SU activities;
- Financial details and donor history;
- Photographic images, video clips and sound recordings.
- SU will only collect personal information necessary for one or more of its legitimate functions or activities.

#### 1.3 Sensitive Information

Some information SU holds may be "sensitive" information.

This may include information or an opinion about an individual's:

- Religious beliefs, affiliations or philosophical beliefs;
- Health;
- Criminal record.
- Financial details and donor history;

SU will only collect sensitive information when the collection:

- Is undertaken with the person's consent;
- Is required by law;
- Is necessary to prevent or lessen a serious and imminent threat to the life or health of the person, and or other persons;
- Relates solely to the members of SU and in which case SU undertakes to the members not to disclose the information without their consent;
- Is necessary in respect of a legal claim.

#### 1.4 Collection Criteria

SU will collect the personal information only by lawful and fair means and not in an unreasonably intrusive way. Whenever SU collects personal information about an individual, SU will take reasonable steps to ensure that the individual is aware of:

- Who SU is;
- The fact that he or she is able to gain access to all personal information held about them by SU;

- The purpose for which the information is collected;
- The consequences for the individual if all or part of the information is not provided.
- Any organisations to which SU usually discloses the type of information being sought;
- Any laws that require SU to collect the information.
- Where possible, SU will collect personal information about an individual only from that individual. If, however, this information is collected from someone else, SU will act reasonably to ensure the individual is or has been made aware of the matters listed above.

## **2.0 Usage and Disclosure**

The purposes for which SU uses personal information it has collected include the following:

### **2.1 Primary Usage**

- To consider potential volunteer's applications and record participation in SU activities;
- To consider, gain permission for, and record participation in SU activities;
- To consider potential employee's applications for employment by SU;
- To meet our legal obligations in terms of child safety and other requirements;
- To administer donations and sponsorship of SU activities;
- To provide services to retail customers;
- To administer contractors of the organisation;
- For promotion, marketing, and retail initiatives such as events, publications, fund raising.

### **2.2 Disclosure Exceptions**

As a general rule, SU will not use or disclose personal information about an individual other than for its primary purposes, except where:

- The individual has consented to the use or disclosure;
- A mailing house has been contracted to pack and despatch SU materials;
- SU has reason to suspect that unlawful activity has been, or may be engaged in, and uses or discloses the personal information as a necessary part of its investigation of the matter or in reporting its concerns to relevant persons or authorities;
- SU reasonably believes that the use or disclosure is necessary to lessen or prevent a serious and imminent threat to an individual's life, health or safety or to public health or safety.

### **3.0 Direct Marketing Material**

SU will provide individuals with options not to receive direct marketing material by:

- Including in each direct marketing communication the option of informing SU if they do not wish to receive further direct marketing communications;
- Including in each direct marketing communication SU's business address and telephone number and, if the communication is made by fax or email or other electronic means, a number or address at which SU can be directly contacted electronically.

### **4.0 Internet Privacy**

SU may collect personal information through the SU Northern Territory website and the website may also collect information which may or may not be personal information. For each visitor to the website, the server may automatically recognise and store:

- The visitor's address (eg the domain name or internet protocol address);
- The type of internet browser used by the visitor;
- Address of the site which "referred" the visitor;
- Clickstream data.
- In addition, the website may use "cookies" to track website usage and statistics. Visitors may set their browsers to refuse cookies, which may limit access to some functions. Tracking will be conducted in such a way to ensure the anonymity of visitors.
- The SU Northern Territory website may contain links to third party websites. SU Northern Territory is not responsible for the privacy practices of these sites.

### **5.0 Data Security**

SU will take reasonable steps to protect the personal information it holds from misuse and loss and from unauthorised access, modification or disclosure. This includes physical security; computer and network security and personnel security.

SU will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed. In instances where information is archived, SU will take reasonable steps to ensure the security of this information.

## **6.0 Data Quality**

SU will take reasonable steps to make sure that the personal information it collects, uses, or discloses is accurate, complete and up to date and will regularly provide opportunities to individuals to revise and update their personal information.

### **6.1 Access and Corrections**

As a general rule, SU will, on request by an individual, provide him or her with access to his or her personal information. If a person can show that SU holds information that is incorrect, incomplete or out of date, SU will take reasonable steps to correct the information. However, SU may not be required to allow access if, for instance:

- Providing access would have an unreasonable impact on the privacy of other individuals;
- The request for access is frivolous or vexatious;
- The information relates to anticipated or existing legal proceedings and would not be discoverable in those proceedings;
- Providing access would reveal the intentions of SU in relation to negotiations with the individual in such a way as to prejudice those negotiations;
- Providing access would be unlawful;
- Providing access would be likely to prejudice an investigation of possible unlawful activity;

### **6.2 Identifiers**

SU will not adopt an identifier in respect of personal information that is the same as an identifier used by the Commonwealth Government.

### **6.2 Anonymity**

Wherever it is lawful and practical, SU will allow individuals the option of not identifying themselves when entering into transactions with SU.

## **7.0 Transborder data flows**

SU will only transfer personal information about an individual to a third party who is in a foreign country in specified circumstances. This would include:

- Where the individual consents to the transfer;
- Where SU has taken reasonable steps to ensure that the information which has been transferred will not be held, used or disclosed by the recipient of the information inconsistently with the NPPs.

## **8.0 Complaint Handling Process**

A complaint by an individual regarding an alleged breach of privacy by SU should be forwarded in writing to the following address:

Director  
Scripture Union Northern Territory  
PO Box 41914  
Casuarina NT 0811  
Email: [director@sunt.org.au](mailto:director@sunt.org.au)

The Director will be made available to investigate and resolve the complaint internally through mediation with the individual.

If the individual is not happy with the resolution of their complaint by the Director, they may then complain to the Privacy Commissioner about the act or practice they consider to be an interference with their privacy. The Commissioner has the power to investigate the alleged breach by examining witnesses, obtaining documents and directing individuals to attend compulsory conferences. The Privacy Commissioner's determination in such cases is enforceable by the Federal Court.

This Policy is subject to review and may change from time to time.

This policy is current as of August 2019.

## **REVIEW**

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- Date Reviewed August 6, 2019
- Council Approval September 9, 2019
- Next Review Date Due September 2021