



# Privacy Policy

## Purpose

At Transform Aid International Ltd (“TAI”), every supporter, volunteer, church, partner organisation and child partner is important to us.

TAI respects and safeguards your privacy and confidentiality. We are committed to accountability and transparency. We continue to strive for the highest possible standards as we comply with the [Australian Privacy Principles](#).

We are committed to protecting our supporters and volunteers. Without them we would not be able to continue caring for and empowering our partner organisations as they seek to lift themselves and their communities out of poverty. TAI recognises that giving to an organisation is a very personal decision. We recognise that you place your trust in us through your dealings with us and we will do everything we can to maintain that confidence

We are committed to protecting the privacy of our stakeholders in partner organisations, including child partners. We recognise our duty to protect personal information from misuse, to only disseminate information that is necessary for our work, and is respectful of dignity and privacy.

## How We Collect and Use Personal Information

TAI only collects personal information about you that is necessary for our work. Personal information is defined as any information that can be used to identify you. If the information that we collect personally identifies you, or you are reasonably identifiable from it, the information will be considered personal information.

The information we collect may typically include your name, address, telephone number, email address, date of birth, occupation, marital status, church relationship, records of your donation/s and payment information for those donation/s, and any communications you have with us.

TAI may collect this information via methods including but not limited to correspondence, website access, electronic sign-up, surveys, donations, event entry forms and conversations between you and our representatives. The information we collect is used to:

- Process donations, commitments and sponsorships
- Issue receipts and donation statements
- Respond to your comments or questions
- Provide you with access to protected areas of our website
- Provide follow up information about the work of TAI
- Provide selected information about child partners (sponsored children) to their sponsors
- Seek your continued support
- Offer other programs or opportunities that may be of interest to you

- Research your attitudes and understanding of TAI and our programs, or about aid and development
- Report internally
- Deal with enquiries and complaints made by you relating to our website
- Provide third parties with statistical information about our supporters (but those third parties will not be able to identify any individual supporter from information provided to them)

We may collect personal information from third parties including law enforcement agencies and other government entities, for example if you are attending a supporter trip overseas we will conduct checks for child protection purposes.

You may choose not to provide us with your personal information, for example, if you give anonymously. In this case we would not be able to provide you with tax deductible or other receipts, or access to protected areas of our website.

## **Disclosure**

We may disclose your personal information:

- a) To our employees, related bodies corporate (for example, our wholly owned subsidiary, Baptist World Aid Australia), partner organisations, contractors or service providers for purposes necessary for our work;
- b) To our contractors who perform tasks directly on our behalf (for example, mail houses, which send our marketing communications, or research agencies). These contractors may also collect personal information on our behalf. We require them to sign strict privacy and security agreements and they are also bound by the Australian Privacy Principles. These agreements ensure that these contractors keep your personal information confidential and do not use it for any purpose other than the work we have contracted them to perform;
- c) To reputable cloud-based organisations with robust security protocols in order to store your data securely including but not limited to Microsoft Azure, Amazon Web Services (AWS), Oracle – NetSuite and Cisco. The secure storage facilities/data centres for these organisations are often located overseas.
- d) To the extent that we are required by law to do so;
- e) In connection with any ongoing or prospective legal proceedings;
- f) In order to establish, exercise or defend our legal rights (including providing information to others only to the extent required for the purposes of fraud prevention, managing cases of suspected or substantiated fraud, reducing credit risk and as otherwise required);



- g) To any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information, where in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

We do not pass on personal information to any third parties other than those stated in this policy, or publish them in our publications or on our website without explicit supporter permission. We do not buy or sell personal information from or to third parties.

## **How We Protect Your Personal Information**

TAI actively seeks to ensure that all personal information we collect is protected from misuse, unauthorised access, modification or disclosure.

We use "cookies" to track visits to our website. Our cookies do not collect personal information and can be disabled at any point through your internet browser settings. Find out more about cookies by reading our Website Rules.

We may use a script to collect information about your interactions with our website when you are logged in. The information collected is stored securely. Information is not collected if you are not logged in, nor is it collected before or after logging into the website.

We make all reasonable efforts to ensure that your information is stored securely, via our secure password and firewall-protected servers, both in electronic and physical forms, and that only those persons who require access are authorised. Staff are employed on the basis that they will protect information about you. All donations and communications made via our website are secure. All electronic financial transactions and payment details entered through our website or by staff directly into our database are protected by encryption technology.

If you have donated to TAI and received a receipt for taxation purposes, by law we must keep a record of your details for seven years.

## **How We Protect Children and Youth**

If you are 18 or older, we will normally assume that you can make your own privacy decisions. When you are under 18, we may need to confirm your decision with a parent or guardian.

We also expect you to take particular care with the images of children from our programs, as we do. We request that you respect the consent given by parents or community leaders by not copying these images unless we provide specific permission. Please refer to our Website Rules for guidance on how you may use

images from our website and our [Child Safe Policy & Code of Behaviour](#) for further guidance on use of child images generally.

At times we may ask for sensitive information. In the interests of child safety, for any supporter travelling to visit our partners overseas, we will require a national police check among other reference checks.

## **Eligible Data Breaches**

The Privacy Act stipulates reporting and management requirements for certain data breaches, known as 'eligible data breaches'. An 'eligible data breach' occurs when personal information held by TAI is lost or unauthorised access, disclosure, or other interference has taken place, and the access or disclosure would likely result in serious harm to the individuals to whom the information relates. 'Serious harm' may include physical, emotional, economic, and financial harm, as well as reputational damage.

Examples of a data breach include: -

1. A device containing personal information of clients is lost or stolen;
2. One of TAI's databases containing personal information is hacked;
3. TAI mistakenly provides personal information to the wrong person.

If TAI suspects there has been an eligible data breach, TAI must carry out an assessment within 30 days of the suspicion to determine whether or not a data breach has occurred. The Risk and Compliance Committee is responsible for determining if an eligible data breach has occurred. In the case of an eligible data breach, TAI must take all steps to immediately contain the breach, determine who needs to be notified of the breach (whether internally and/or externally), what the best form of notification is, and how this process will be managed.

For details on the procedure of handling an eligible data breach, please refer to the Notifiable Data Breaches Procedure.

## **Third Party Websites**

Our website includes hyperlinks to, and details of, third party websites. We have no control over, and are not responsible for, the privacy policies and practices of third parties.

## **Your Right to Information**

Whilst we keep all personal information about you secure from others, you may request access to your information at any time. If you would like to know what information we hold about you, or there is an error you would like to correct, please contact our Privacy Officer. We may ask for verification of your identity when you request access to your information. If you wish to have your personal information deleted, we will take reasonable steps to delete it unless we need to keep it for legal, auditing or internal risk management reasons.

TAI may decline to provide details of personal information to a supporter in any legal dispute where access is not permitted.

There may be cases where we cannot provide access to personal information we hold, for example, where providing access would interfere with the privacy of others or breach confidentiality. We will not disclose addresses of child partners to supporters or any other information that would enable a supporter to identify the child's private home (see our [Child Safe Policy](#)). If we refuse to grant access to personal information, we will provide written reasons for the refusal.

If we use personal information in ways other than as stated in this policy, we will ensure we comply with the requirements of Privacy law.

## **Updating Information**

Please let us know if the personal information that we hold about you needs to be corrected, updated or completed.

TAI aims to ensure that the information we collect about you is accurate, complete and up-to-date. We may at times contact you to ensure that it is.

## **If You Have Concerns or a Complaint**

Respecting your privacy is very important to us and we make every effort to ensure this occurs. However, if you believe we have breached your privacy rights in any way, or you would like to discuss any concerns you may have with our Privacy Policy, please contact our Privacy Officer. Where you request a response, you can expect to hear from us within 30 days. We will treat your complaint or request with confidentiality.

The Privacy Officer  
Transform Aid International  
Locked Bag 2200  
NORTH RYDE BC NSW 1670

Email: [privacy@baptistworldaid.org.au](mailto:privacy@baptistworldaid.org.au)  
Phone: 1300 789 991

## **Review and Continuous Improvement**

TAI is committed to ensuring that policy, systems, procedures and processes are fit for purpose and to that end undertakes a process of continuous review of policy, systems, procedures and processes in relation to privacy and the Australian Privacy Principles. This process of continuous review is how the organisation commits itself to safeguarding not only compliance but within that review process, the best possible outcomes are delivered for our supporters in relation to the

information they supply to us and which may be collected as part of the interaction process.

## Changing This Policy

We may make changes to this policy from time to time without notice. Any changes will be updated on our website.

## Related Policies and Procedures

- Policy Development Policy
- Policy Development Procedure
- Complaints Handling Policy
- Fraud Control Policy

## Document Control Information

Privacy Policy	
Owner	Director of Finance and Operations
Master Copy	Policy QA Coordinator
Date created	2011
Date last reviewed	02/10/2018
Approved by Director of Finance and Operations	02/10/2018
Approved by Executive	10/01/2018
Endorsed by FRC	31/01/2018
Approved by Board	25/05/2018
Date next Review	25/05/2020

Date	Version	Revision Description	Reviewed / Updated by
2011	1	Original version	Director of Business
01/04/2014	2	Update to reflect new Australian Privacy Principles	Privacy Committee/Director of Business
01/07/2016	3	Templated from BWAA version	Governance & Compliance Specialist
01/08/2016	4	Updated Disclosure Item (c) to accord with Fraud Control Policy	Governance & Compliance Specialist
07/09/2016	5	Updated 'How we collect and use personal information' to reflect current practice regarding how supporters can	Policy QA Coordinator



		change what communication they receive	
15/12/2017	6	Updated to align with Australian Privacy Principles, include partner organisations and child partners more clearly Added Eligible Data Breaches Section	Governance and Compliance Specialist, Policy QA Coordinator & Privacy Committee
02/10/2018	7	Added new point c) under Disclosure section to capture overseas data storage.	Supporter Engagement Lead and Privacy Committee