



Privacy

PURPOSE

This policy describes how Empowerment Without Borders (**EWB**) will manage personal information and fulfill its obligations under the *Privacy Act 1988*. This policy details the personal information collected by EWB, including why the organisation holds personal information, how it is protected, and the choices individuals can make about their personal information.

POLICY

EWB respects individual privacy and is committed to protecting personal information. EWB applies the Australian Privacy Principles (APP) contained in the *Privacy Act 1988*, and is guided by the Code of Ethics and Professional Conduct of the Fundraising Institute of Australia.

DEFINITIONS

Privacy	<p>In Australia, privacy law generally relates to the protection of an individual's personal information. Personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable.</p> <p>Privacy also relates to many areas including the right not to be watched, listened to or reported upon without consent and not to be the focus of uninvited public attention. Privacy can be applied to clients' physical environment and possessions, physical needs, personal relationships and personal information and needs.</p>
Personal information	<p>In the <i>Privacy Act</i> 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.</p>
Sensitive information	<p>Information or an opinion about an individual's:</p> <ul style="list-style-type: none">• racial or ethnic origin• political opinions or associations• religious or philosophical beliefs• trade union membership or associations• sexual orientation or practices• criminal record• health or genetic information• some aspects of biometric information.



	Generally, sensitive information has a higher level of privacy protection than other personal information.
Record	<ul style="list-style-type: none">• A document• A database (however kept)• A photograph or other pictorial representation of a person• Biometric data
Cookies	Pieces of data that a website transfers to a computer's hard drive for record-keeping purposes.

PROCEDURES

Collection and storage of personal information

EWB collects and retains personal information necessary to assist in achieving our mission, managing our relationships with donors and other supporters, keeping people informed of our activities, strengthening the organisation through fundraising and complying with law.

EWB will collect personal information only by fair and lawful means. Whenever reasonably possible, we will collect personal information directly from the individual.

The kinds of personal information that we collect and hold about you may include:

- identifying information, such as your name;
- contact information, such as your postal address, email address and telephone number;
- financial information, such as the payment details supplied to us when you make a donation (or to a third party that collects donations on our behalf);
- details of any services or training we provide; and
- records of our communications with you, including any messages you send us.

EWB will collect sensitive information with the individual's consent when the information is reasonably necessary for the activities of EWB.

Where EWB will collect information through surveys or other similar methods, the Australian Privacy Principles states that individual respondents should be informed that participation in a survey is voluntary and they can choose to remain anonymous. EWB will disclose how the information will be shared and used. Informed consent during activities such as these will be agreed and recorded.

EWB will ensure contractual arrangements with external research firms include privacy clauses to ensure the consultant firm are also subject to privacy legislation equivalent to that in force in Australia.

Individuals who contact EWB have the option of requesting anonymity, with the exception of donors who wish to receive tax receipts, from whom we need to obtain limited personal information in order to issue acknowledgement of contributions for tax purposes. EWB will practice donor



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confidentiality and will only publicly identify EWB donors with their advance knowledge and permission.

EWB will take steps to destroy or de-identify personal or sensitive data where required under the Privacy Act, including on occasions when that data is no longer required. This includes donation and donor data, employee data and other sensitive information.

Online

To improve its website, EWB collects standard information about website visitors, including cookies provided by a third party. This information is accessed by EWB anonymously and in aggregate in order to track statistics about website usage. This information may also be accessed by **Google Analytics**; however, EWB will make no attempt to identify individual users or their browsing activities except where required by law.

Personal information is collected through the EWB website or other online channels when individuals make a financial transaction; sign up to receive information from EWB; send a message through our contact form; or submit personal information into our website or the website of a third-party vendor acting on our behalf for any other reason. Credit card details collected through the EWB website are held securely by our third-party payment gateway; EWB does not store these details. All other personal information collected by EWB through the EWB website is stored securely and only accessible by authorised EWB representatives.

Offline

Personal information is collected over the phone or in person when individuals provide it to us for any reason, including to make a donation or other financial transaction, or to request information from EWB. Credit card details collected over the phone or in person are encrypted in our database, and all personal information is stored securely where it is only accessible by authorised EWB representatives.

Third-parties

Personal information collected by third-party vendors on EWB's behalf, either through online or offline channels, will be subject to that vendor's own privacy policy and practices. Third-party vendors collecting personal information on behalf of EWB will identify themselves to individuals as such, to enable them to make informed decisions about when and how they disclose their personal information. EWB will take reasonable measures, contractual and otherwise, to ensure that third-party vendors contracted on our behalf will safeguard personal information to the same standard as EWB; however EWB cannot control or be held liable for the business practices of third-party entities to whom personal information is provided.



Use of personal information

As noted, EWB collects and retains personal information to assist in achieving our mission, managing our relationships with supporters, keeping people informed of our activities, strengthening the organisation through fundraising and complying with law. EWB will use personal information for these purposes, and for other related purposes for which you would reasonably expect it to be used, with your consent or otherwise as permitted by law.

We may from time to time use your personal information in order to send you marketing materials about our activities, and those of our partner organisations. You can opt-out of receiving marketing communications from us by contacting us or following the “unsubscribe” link in the communication.

Occasionally we also allow like-minded organisations to contact you with information that may be of interest to you, including some organisations located outside Australia. Those organisations allow us to do the same and this way we can reach more people with vital information.

EWB will not share personal information with third parties unless you consent, the sharing is with our contractors and is necessary for them to perform specific functions required by EWB (e.g. donor name and contact details may be shared with an external marketing provider in order to contact donors for direct marketing purposes), or the sharing is otherwise permitted or required by law. When sharing information with contractors, EWB will take contractual measures to ensure that our contractors safeguard personal information as well as we do, and that personal information is only kept for as long as is necessary to fulfil the required function.

Overseas disclosure

EWB may disclose personal information to overseas recipients in limited circumstances and only as required by the nature of our work. Circumstances where EWB may disclose personal information overseas include where arranging travel for a contractor engaged by EWB or supporting professional networking between contacts in Australia and overseas.

EWB will only disclose personal information to overseas recipients in countries where we are actively engaged, including those listed on our website.

Accessing and correcting personal information

Individuals have the right to request access to and correct personal information we hold about them, subject to exceptions listed in the *Privacy Act 1988*. Upon request, and within the parameters of the legislation, EWB will provide individuals with access to this information. To protect the integrity and security of the information we hold, we may ask that you follow a defined access procedure, which may include steps to verify your identity. In certain cases we may charge you an administration fee for providing you with access to the information you have asked for, but we will inform you of this before proceeding. There may be cases where we are unable to provide the information you request, such as where it would interfere with the privacy of others or result in a breach of confidentiality. In these cases we will let you know why we cannot comply with your request.



Privacy Enquiries and Complaints

EWB is committed to working with individuals to obtain a fair resolution of any privacy concerns. If you are concerned about the way in which we are managing your personal information and think we may have breached the Australian Privacy Principles, or any other relevant obligation, please contact us using the contact details set out below. We will deal with the matter within a reasonable time, and will keep you informed of the progress of our investigation. If we have not responded to you within a reasonable time or if you feel that your complaint has not been resolved satisfactorily, you can contact us to discuss your concerns.

Please contact us by emailing EWB's Privacy Officer at info@empowermentwithoutborders.org

You are also entitled to make a complaint to the Office of the Australian Information Commissioner (OAIC). You can obtain further general information about your privacy rights and privacy law from the OAIC by:

- calling their Privacy Hotline on 1300 363 992
- visiting their web site at <http://www.oaic.gov.au>
- writing to:

The Australian Information Commissioner
GPO Box 5218
Sydney NSW 1042

RELEVANT DOCUMENTATION

- Client Information Pack
- Complaint Record Form
- Complaints Register

OTHER RELEVANT POLICY AND PROCEDURES

- Incident Management
- Information Management
- Risk Management



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APPLICABLE STANDARDS AND LEGISLATION

*Australian Council for International Development (ACFID) Code of Conduct – Commitment 7.2
Meeting legal and compliance obligations*

Payment Card Industry Data Security Standards

Privacy Act (Cth.) 1988