

Pope Kyrillos & St Habib Guirguis Coptic Orthodox Church, Monterey, Sydney

Privacy Policy

Introduction

Your privacy is important to us, that is why the Church is committed to maintaining an environment and processes that protect the privacy of individuals associated with our church to ensure that we uphold your trust. Our Privacy Policy has been developed using the *Australian Privacy Principles (APP)* as governed by the *Privacy Act (1988)* and covers how we collect, use, disclose and store your information.

For more information about the *Privacy Act (1988)* please refer to the National Privacy Commissioner's website at: <http://www.privacy.gov.au>

1. Why we collect your personal information

We provide a range of Christian services and programs including face-to-face and online church services, kids' and youth programs, specialised pastoral care as well as community and missions projects. Participation in our programs and activities requires us to collect some information from those who want to be involved with our church to enable us to communicate effectively and provide the requested services.

2. What is your personal information?

In general terms "personal information" has the meaning given to it in the Act. This is information that can be used to identify you and may include your name, address, telephone number, email address and profession or occupation. If this information identifies you, or you are reasonably identifiable from it, then it is considered personal information.

3. Personal Information we collect and hold

The information that we collect from you will vary depending on the nature of your involvement and activities with which you choose to engage. We endeavour to only request information that is reasonably necessary for the activities you are seeking to be involved in. You are not required to provide the personal or sensitive information that we request, but if you choose not to provide it, it may hinder or prevent your involvement or inclusion in some activities and communications and the degree of pastoral support and care we can provide you with.

The information we collect may include:

- Personal details such as your title, name, date of birth, marital status and gender.
- Contact details such as your mailing or street address, email address, mobile and home or work telephone numbers.
- Family details such as spouse, children.
- Profession, occupation or job title.
- Details of services we have provided you or about which you have enquired.
- Any additional information relating to you that you provided to us directly through our representatives or otherwise.

- Information you provide to us through our activities and services, surveys or visits by Church representatives.

Some services (including other activities) of Pope Kyrillos & St Habib Guirguis, Monterey Coptic Orthodox Church are recorded. Images of people attending or participating in the service (or other activity) may be used for promotional or other purposes. Through attending any service (or other activity) you agree to Pope Kyrillos & St Habib Guirguis, Monterey Coptic Orthodox Church using your image in these circumstances.

In the interests of security and safety, and the comfort of the Church community, the church also operates video cameras within and around some Church premises and, as such, collects images of people attending the premises.

3.1 Sensitive personal information

Some personal information is considered sensitive information, and, at times, it may be necessary for us to collect such information including:

- On occasion, with your consent, health information where it is necessary for one or more of our functions or activities.
- Religious information such as spiritual milestones, denominational details, attendance.
- Country of origin and ethnic background.
- Professional and practice information.
- Personal credit card data.
- Passport details.
- Criminal record or Working with Children Check information.
- Any idiosyncratic or personal information we obtain from you.

3.2 Anonymity and use of a pseudonym

In some instances, you will have the right to not identify yourself or to use a pseudonym when contacting us or participating in activities or obtaining services or assistance from us, unless we are authorised by law not to do so or it is impracticable for us to deal with individuals who have not identified themselves or have used a pseudonym. In such circumstances we will only obtain as much personal information as is necessary to provide you with the service or assistance you require. However, in some circumstances we may be limited in our ability to provide you with services or assistance without your personal information.

4. How is your personal information collected?

Personal information is collected directly from you unless it is unreasonable or impracticable to do so. Personal information may be collected in a number of ways including:

- The Church Registration Forms,

- During telephone calls.
- Through your access and use of our website, email or social media platforms.
- When you complete an application or purchase order.
- During conversations (face to face contact) or via correspondence between you and our representatives.
- When you register for conferences or Church events which can involve 3rd party service providers.
- When you complete our forms for the provision of services or to volunteer your services and assistance to the Church or its various organisations.
- When you complete a survey or make a donation.

Voice or image recordings.

4.1 Collection of your information from third parties

Personal information may be collected from third parties such as credit reporting agencies, law enforcement agencies, other government entities and specialist agencies to assist the Church achieve its objectives. This collection from third parties may occur in circumstances such as recruitment when conducting a criminal record check or verifying a Working with Children Check.

4.2 Unsolicited collection of personal or sensitive information

At times we may discover personal or sensitive information about you from a third party (e.g. A parent registering a child's friend for an activity or program) If it is not information that is necessary for conducting Pope Kyrillos & St Habib Guirguis, Monterey Coptic Orthodox Church activities, we will take steps to destroy or de-identify the information if it is lawful and reasonable to do so. We will make all legally required and reasonable attempts to advise you of the information we hold. Attendance at any of our programs or activities will be considered implied consent for us to hold any personal or sensitive information required for the program or activity.

4.3 Cookies

Access to our public website is anonymous, except for any area where you login with your own account or enter your personal details.

Our website uses cookies to provide analytical data around the use of the site which can assist us in providing services to you. When you visit our public website, the following data is supplied by your browser:

- The date, time and length of your visit
- Your IP address
- Your operating platform
- The pages and resources you accessed

Our website may contain links to third party websites. Our privacy policy does not apply to other websites and we encourage you to read the privacy policy of any website you link to from ours.

4.4 Identifiers

We hold Working with Children Check Numbers as required by law. We also collect passport information for people participating in short term mission trips.

5. Security and holding of your information

We take all reasonable steps to protect the personal and sensitive information we hold from interference, misuse, loss, unauthorised access, modification or disclosure.

Our IT systems are password protected and only authorised personnel are permitted to access your data. Where we use cloud storage, we take reasonable steps to ensure that the providers we use have privacy policies in place that comply with Australian Privacy regulations and principles.

We will permanently de-identify or securely destroy personal information once there is no longer a legal or other need for us to retain it.

Care will be taken to ensure the integrity of information contained in files. Personal opinions will not be reflected as facts.

We will take reasonable steps to ensure your information is relevant, accurate, complete and up to date. We regularly provide opportunity for you to update your details.

6. How we use your information

We will only use personal information for the primary purpose for which it is collected. In most cases, the purpose will relate to the spiritual, pastoral, social, educational and administrative functions of the Church. Those functions include maintaining personal information for the purpose of providing pastoral care within our congregation, and for the promotion of activities and functions associated with the church.

We collect personal information from members of our congregation and visitors to our church for a variety of pastoral reasons so that we can perform our activities and functions and to provide the best possible quality of service for the following purposes:

- To provide services to you and send communications to you.
- Answer enquiries and provide information or advice on existing and new services.
- To update our records and keep your contact details up to date.
- To enabled the development and promotion of other activities and services and to improve our general ability to assist Church attendees and the wider community.
- For the immediate reason for which you have provided it to us (for example, to enable us to process your request, payment, registration, travel documentation etc.

6.1 Direct marketing

At times we will use your personal information to directly communicate with you about topics which we think may interest you, and would benefit you, such as church events. This communication will generally be in the form of email or text message. You will always have the ability to opt out of these communications, unless the communication is required for your involvement in a specific event, ministry or other area in which you have chosen to participate.

7. Disclosure of your information

At times we may need to make your personal and sensitive information available in order to provide pastoral services or manage certain aspects of our ministries and programs, or because it is a legal requirement. Disclosure of your information will only be made in accordance to the provisions and exclusions of the Australian Privacy Principles. Disclosure of your information will occur for the following reasons:

The provision of pastoral care or administration of church ministries and programs. We provide personal information to Church staff and lay leadership who have agreed to a confidentiality statement, as related to the area of ministry in which the staff member or lay leader is involved. It is reasonable to expect that pastoral care cannot be done thoroughly without the use of lay leaders, and therefore the information collected may be disclosed for purposes of pastoral care.

Access to these files by persons other than those who created the file should only occur in cases where pastoral care is being provided by another authorised staff member and the information contained in the file is necessary for effective pastoral care.

Care will be exercised when sending group emails to ensure email addresses are not provided unless authorised by the owners. To ensure privacy the "BCC" field will be used, as people whose names are in the "BCC" field cannot be seen by other recipients.

When there is reasonable need to provide contact details of church members to other church members who are involved in a team ministry together, pastors or staff may disclose those details.

The disclosure is required or authorised by law or court order, and it does not breach the Australian Privacy principles and the recipient of the information is subject to provisions of protecting such information substantially similar to those of the Australian Privacy Principles.

Non- identifiable information may be provided to research organisations if such information will benefit the provision of church services and programs.

A Priest is to consult with their colleagues if asked by a congregation member to reach out to the third party. Such a consultation will be for the purpose of identifying the appropriateness of the contact and identifying what information, if any, can be provided to the third party to avoid breach of privacy.

7.1 Public Prayer

Due to the often-sensitive nature of prayer requests, and taking into consideration the dire need often represented by a prayer request, we have endeavoured to implement a process which will protect the privacy of individuals and yet still allow those in our Church to be prayed for should they desire it. Names may only be used in public prayer if consent is first gained from the person who is the subject of the prayer request.

These guidelines will apply to all prayer within the Church that could be considered public, including any prayer requests submitted to the Intercessory Prayer Group.

7.2 Cross-Border disclosure of personal information

In order for you to participate in a short-term mission trip we will provide personal, and sensitive information including passport details and relevant medical information including vaccination details, to our missions' partners for the provision of travel and visa applications. This information may also be provided to third party government and travel agencies as is necessary for your trip.

No personal information will be sent without the individual's consent, and only in the manner that the individual prescribes.

7.3 Safe guards

Your personal information will not be shared, sold, rented or disclosed in accordance with this privacy policy.

We do not give, sell, rent or loan any identifiable information regarding members and adherents to any person or organisation without the consent of the person involved.

We do not provide your personal information to other organisations for the purposes of direct marketing.

7.4 Breach of Privacy

You need to be aware that confidentiality can be legally breached by issues relating to subpoenas or mandatory reporting. Over and above subpoenas and mandatory reporting, a decision to breach confidentiality may also be taken in the following situations:

- Suspected abuse and neglect.
- Actual or possible overdose situations.
- Where an individual issues substantive threats of intended violence or harm either to themselves or to others.

Apart from the above, confidentiality will be regarded as a sacred trust by any Priest. Such breaches of confidentiality will be made only after the Priest has consulted with their supervisor or professional associate.

In response to any subpoena, only the material specifically requested will be provided, in whatever form it may be held. Legal advice is recommended.

Released material must only be delivered to official individuals (e.g., to the Clerk of the Court) and an official receipt obtained.

8. Access of personal information

You have every right to access your personal and sensitive information, subject to exceptions allowed by the law. There may be instances where we cannot grant your access request, for example where:

- Granting you access would have an unreasonable impact upon someone else's privacy.
- Any other reason consistent with the Privacy Act.

8.1 Correction of Information

If you believe that personal information we hold is incorrect, incomplete or inaccurate, then you may request us to amend it by contacting us via the contact details below. We will consider whether the information requires amendment. If we do not agree that there are grounds for amendment, then we will add a note to the personal information stating that you disagree with it.

9. Questions and Complaints

If you have any further questions about our Privacy Policies, please contact our Church Secretary.

If you have concerns about our Privacy Policy, or if you need to make a complaint about a possible breach of this policy, please contact our Church Secretary.

10. Policy Review

This policy will be reviewed every 5 years or as required by legislative change.