



# **Privacy Policy**

## ***Sunrise Children's Association Incorporated***

### **Introduction**

Sunrise Children's Association Incorporated (SCAI) is committed to protecting the privacy of personal information that we collect, store, use and disclose, in accordance with the requirements of the Australian Federal Government's Privacy Act 1988 (Cth) and the Australian Privacy Principles. We are also committed to only using third party service providers such as giving platforms that have strict privacy policies that are compliant with the Privacy Act.

### **Purpose**

The purpose of this policy is to provide a framework for SCAI to ensure the privacy of individuals from whom we collect personal information. It provides information for donors, supporters and other stakeholders about how we will store, use and disclose that information, and our relationship with third party service providers. Further, this policy provides information about how an individual may access their personal information and seek to correct it or make a complaint about a breach of privacy.

### **Scope**

This policy applies to all individuals working in SCAI, including committee members, other responsible persons, public fund trustees, employees, consultants, and volunteers, and covers information collected directly or by a third party.

### **Policy**

SCAI recognises the essential right of individuals to have their information administered in ways that they would reasonably expect. SCAI is bound by laws that impose specific obligations when it comes to handling information. SCAI has adopted the following principles as minimum standards in relation to handling personal information.

SCAI will:

- Collect only information which we require for our primary functions and activities;
- Inform you about why we collect information and how we use it;
- Use and disclose personal information only for our primary functions or for a directly related and reasonably foreseeable purpose, or for another purpose only with the person's consent;
- Store personal information securely, protecting it from unauthorised access;
- Provide stakeholders with access to their own information held by SCAI, and the right to seek its correction; and
- Maintain open and transparent policies concerning personal information including by having an up to date Privacy Policy that is publicly available on our website

### **Procedures**



This section outlines our key functions and activities that involve the handling of personal information, what type of information we collect and how we collect it, the purpose of collecting the information and how we use and disclose it.

### Collection, Use and Disclosure of information

We only collect information that is important for the performance of key functions and activities of SCAI, such as communicating with donors and other supporters, sending newsletters to stakeholders, promoting events, running our website, conducting publicity campaigns, managing the SCAI committee, member and staff records and financial management.

#### Donors and Supporters

- Where possible we collect personal information such as name, address, email and contact number of donors. We collect this either directly from the individual or through our affiliated online giving platforms Give Now and good2give that individuals use to donate to us. This is so we can contact you with updates about SCAI, our projects, your donations, beneficiaries and other information we think will be of interest to you. It also enables us to contact you if we have any queries about your donations.
- We may also ask for optional information such as date of birth and gender from time to time. This is so we can tailor our communications and things like events in a more relevant manner.
- We keep this information on our internal database. We do not sell it or rent it, use it to spam you or provide it to any other organisations, except for the service providers who help us contact our donors, supporters and stakeholders. For example, we provide your name and email address to Mailchimp, the email marketing company, to send out our newsletters and other information.
- When you engage with us in any way, such as making a donation, an enquiry or comment or attended an event, you are giving us permission to contact you unless you tell us otherwise. You can opt out any time by clicking on the unsubscribe link in our mailchimp emails or by sending us an email and we will remove you from our mailchimp and internal database within 5 days. You can view Mailchimp's Privacy Policy here [www.mailchimp.com/legal/privacy](http://www.mailchimp.com/legal/privacy).
- When you make a donation to SCAI through our Westpac bank account we only have the information that is provided by law by banks about the transactions made. When you make a donation through the online giving platform Give Now, we have access to the personal information and donation information that you enter and payment history, but we do **not** have access to your financial information (credit card or bank account details). You can login and change your personal or donation details at any time using the username and password you set up with Give Now - we are not authorized to do this for you or access your account. You can view Give Now's Privacy Policy here [www.ourcommunity.com.au/privacy](http://www.ourcommunity.com.au/privacy).
- We sometimes collect personal information from a third party or a publicly available source and contact you if we think our organization and work may be of interest to you. Such communications will contain no more than factual information about what we do.

#### Event attendees/ participants

- We collect personal information such as names and email addresses either directly or through Trybooking, so that we can manage the events effectively, provide you with updates about the events, your donations and other information we think will be of interest to you. We do **not** have access to financial information such as your credit card details. You can view Trybooking's Privacy Policy here [www.trybooking.com/info/privacy](http://www.trybooking.com/info/privacy).



- We may also ask for optional information such as dietary requirements, which help us meet your needs at the event.
- We keep this information on our internal database. We do not sell it or provide it to any other organisations, except for the service providers who help us contact you, such as Mailchimp. You can opt out any time by clicking on the unsubscribe link in our mailchimp emails or by sending us an email and we will remove you from our mailchimp and internal database within 5 days.

#### Committee, staff and members

- We collect personal information that is reasonably expected to be provided on a CV, such as name, address, email, contact number, work experience and job history of people who work with or apply to work with us. This is so we can meet the HR requirements of the organization and any statutory requirements.
- We collect information about members through membership application forms.
- We keep this information on our internal database. We do not sell it or provide it to any other organisations, except for the service providers who help us contact you, such as Mailchimp or if required to meet statutory obligations.

#### Website users

- We also collect personal information through our website and social networking services such as Facebook and YouTube. We use this information to improve our website and receive feedback from the community.
- We use Google Analytics to collect data about your interaction with our website so we can improve your experience when visiting our site. The types of data we collect includes how many people are visiting our website, what pages are visited, how long is spent on each page, geographic location (country only), referring domain and out link if applicable, search terms and pages visited, date and time when website pages were accessed. If you do not want your Website visit data reported by Google Analytics, you can install the Google Analytics opt-out browser add-on. You can view google's Privacy Policy here <https://policies.google.com/privacy>.
- Website users are monitored by using Cookies. A 'cookie' is a small file placed in your web browser that collects information about your web browsing behaviour. Use of 'cookies' allows a website to tailor its configuration to your needs and preferences, as well as potentially serve ads to you while you are browsing the Internet. Although 'cookies' do not access information stored on your computer or any personal information (e.g. name, address, email address or telephone number), they do allow collection of identifiable information.
- There are links to other sites on our website. These sites are not monitored or controlled by SCAI and therefore we cannot take responsibility for their content or privacy practices. We have provided links to the main third parties we are associated with in this Privacy Policy. We recommend referring to their websites to ensure you access their most up to date policies.

#### Users of Social Networking Services

- We use social networking services such as Facebook and YouTube to communicate with the public about our work. When you communicate with us using these services we may collect your personal information, but we only use it to help us to communicate with you and the public. The social networking service will also handle your personal information for its own purposes. These services have their own privacy policies. You can view the privacy policies here <https://www.facebook.com/policy.php> and <https://policies.google.com/privacy>.



## General

- If we collect personal information about you from a third party, we will ensure we are able to advise you about where your personal information was collected from. For example, Give Now, a friend booking a ticket to a fundraising event for you, a referee, or a publicly available source. This information may be required for background checks that are necessary as part of our registered charity commitments and obligations.
- We will only collect sensitive information with your consent. Sensitive information may include health information and information about religious beliefs, race, gender and others.
- Where unsolicited information is received, we will determine whether the personal information could have been collected in the usual way. If so, it will be treated normally in accordance with this policy. If not, it will be destroyed. The person whose personal information has been destroyed will be notified about the receipt and destruction of their personal information.
- We will only use or disclose information:
  - for the primary purpose for which it was collected; or
  - a directly related and reasonably foreseeable secondary purpose; or
  - if legally obliged to do so; or
  - if required to do so in order to prevent serious and imminent threat to life, health or safety.In all other cases, we will obtain consent from the concerned person.
- We will not provide your personal information to our partners, beneficiaries, government agencies or similar in Nepal without your permission. We will only provide your name where it is for the purpose of correspondence between sponsors and beneficiaries through us. Google and social media networks such as Facebook may collect and store information overseas, which is outside of our control. Please refer to their privacy policies should you have any concern.

## Storage

- We will implement and maintain steps to ensure that personal information is protected from misuse and loss, unauthorized access, interference, unauthorized modification or disclosure.
- Before we disclose any personal information to a third party including a provider of IT services such as servers or cloud services, we will establish that they are privacy compliant.

## Destruction and de-identification

- SCAI will change information to a pseudonym or treat it anonymously if required by the person whose information we hold and will not use any government related identifiers unless they are reasonably necessary for our functions.
- Committee or staff who have access to your personal information are subject to confidentiality agreements, and are obliged to delete, hand over or cease access to any personal information that they acquired as a result of their appointment or employment with SCAI once their term has ended.

## Data Quality



- SCAI will take reasonable steps to ensure the information we collect is accurate, complete, up to date, and relevant to the functions we perform.

### **Openness and transparency**

- SCAI will ensure project sponsors are aware of this Privacy Policy and its purposes and make this information freely available on the organisation's website.

### **Access and Correction**

- SCAI will ensure individuals have a right to seek access to information held about them and to correct it if it is inaccurate, incomplete, misleading or not up to date.

### **Anonymity**

- SCAI will allow people from whom the personal information is being collected to not identify themselves or use a pseudonym unless it is impracticable to deal with them on this basis.

### **Compliance with this Policy**

The policy is communicated to all committee members, trustees and staff of SCAI. The prevention, detection and reporting of breaches (alleged or not) are the responsibility of all those working with or for SCAI. If the committee has a reason to believe that a person subject to the policy has failed to comply with it, it will investigate the circumstances and take appropriate action. The Secretary will keep records of any investigations or breaches.

The committee of SCAI will review this policy regularly and may update it from time to time to take into account new laws, regulations, practices and technology. The collection, storage, use and disclosure of personal and financial information held by us will be governed by our most recent Privacy Policy, which will be posted on our website. We will notify project sponsors directly of any changes to the privacy policy via email. For non-project sponsors, updates may be advised to you by updating this page on our Website.

### **How to contact us:**

For questions about this Privacy Policy, or to make a complaint about how we have handled your information or a breach of the Australian Privacy Principles, please contact us at [enquiries@scai.org.au](mailto:enquiries@scai.org.au), 0870790111 or Suite 4, 17 Hackney Road, Hackney, SA 5069. We will respond to any complaints within 30 days.

### **Related Documents/References**

Australian Privacy Principles (APP)

Australian Government's Privacy Act 1988 (Privacy Act)