

# INTERNATIONAL NEEDS AUSTRALIA

## Board of Directors Policy

### **Title: 1.4 Privacy Policy**

**Date of Adoption:** 6<sup>th</sup> February 2004

**Amended** 28<sup>th</sup> May 2015

**Amended** 27<sup>th</sup> June 2018

**Amended** 23<sup>rd</sup> June 2021

*This policy is to be reviewed no later than June 2024*

#### **Purpose**

The purpose of this Policy is to establish how INA collects, protects and uses information about donors. This policy complies with the Privacy Act 1988 and Privacy Regulation 2013, including the Australian Privacy Principles.

#### **Definitions**

For the purposes of this Policy:

Contact information is: details such as name, address, phone numbers and email addresses.

INA supporter information is: details specific to the donor's history with INA, including donation records, correspondence records and project interests.

Financial information is: details such as bank account and credit card numbers used to process donations.

Personal information is more detailed personal information such as gender, age, date of birth, church affiliations etc.

Supporter information is a collective term which refers to all of the above categories.

#### **Policy**

All persons who deal with INA have a right to know their information is kept private. INA recognises the trust placed in the organisation and does everything possible to maintain that trust. All staff, Board Members and volunteers commit to the protection of personal information held by the organisation. Any concerns or inquiries regarding privacy will be attended to respectfully and promptly.

All information provided to INA remains confidential and is only used in line with this Policy. Donors have the right to make donations anonymously if they wish.

#### **How information is collected:**

INA collects supporter information with their consent. Information may be collected via our website, hard copy forms, phone calls, emails, social media, voucher books or event sign-up sheets. Supporter information collected online is processed through secure forms to protect that information.

#### **How information is used:**

Contact information is used to process receipts, forward correspondence from Linked Children and INA's in-country partners, contact donors about their support and keep them informed of INA's work. projects and any events, issues or developments they may have an interest in. Supporters may unsubscribe from INA's communications at any time.

Financial information is used to process transactions in line with the donor's request.

INA supporter information is used to track donor history and provide receipts and reports to donors, customise supporter engagement and contribute to internal organisational reports.

Sometimes INA will collect personal information such as church affiliations, age etc. to build a picture of the supporter base for organisational information only. Personal information is collected with consent and supporters may decline to provide this without affecting the processing of donations, receipts and communications.

#### How this information is held:

When INA has collected information about supporters, this information would only be modified by staff for clarity on the supporter's database record or uniformity on the database. Supporter information collected by INA is treated as strictly confidential and is never disclosed to a third party without prior consent, unless required by law.

INA will make all reasonable efforts to ensure that all supporter information is stored securely - both in electronic and physical forms.

INA's has strong privacy controls and anti-hacking safeguards in place. INA's cloud based platforms follow strict security protocols and guidelines that are in line with industry standard best practices in cyber security and data protection. Our site security is managed by multi-layered, cutting edge security.

If and when INA employs external contractors, such as a mailing house, any supporter information disclosed to the contractor remains property of INA by written contract.

Financial information will be held securely in password protected, encrypted software and locked cabinets. Financial information which is no longer required for the processing of payments will be securely destroyed after the legal timeframe has elapsed.

#### Data collected online

INA's website uses secure response forms when we ask for personal and payment card details and we work hard to keep this information secure by having safe systems in place.

INA uses "cookies" to track visits to our website, social media profile or interaction with our digital services such as emails. A "cookie" is a small text file placed on a user's computer by our web server which can later be retrieved by our web servers. Users can choose if and how a cookie will be accepted by configuring preferences and options in their browser.

Cookies can be used for marketing purposes, and to provide a more effective and personalised experience on our website.

INA may collect information about how supporters use our digital services to tailor our services to them. For example, when a supporter clicks on a link on our emails or website, visits a website which displays INA advertisement, or engages with us online via social media like Facebook. Usually, the information we collect in this way is only general information derived from cookies and does not identify the user.

INA also uses advertising companies (e.g., Google and Facebook) to deliver online advertising where INA banner advertisements are placed on Third Party websites. When viewing an INA advertisement on a Third-Party website, the advertising company uses cookies and, in some cases, 'web beacons' to collect information such as:

- the server the computer is logged onto.
- the browser types.
- the date, time and general location (country, state or city) of the visit; and
- the performance of our marketing efforts.

Any data breach of supporters' information will be notified to anyone affected as soon as possible after breach is discovered. Any staff, board or committee member or volunteer who becomes aware of any data breach must notify the CEO or the Finance Manager immediately.

*Opting out of further correspondence:*

Each time information is sent to supporters they will be given the opportunity to elect not to receive any further information from INA. Supporters may contact the office directly at any time to cancel further communications, or to amend correspondence preferences.

*How supporters can access and correct the information held:*

All supporters may have access to the information held about them upon request. This is consistent with INA's commitment to transparency. INA will attempt to provide the information in the requested format if possible. Any supporters wishing to know what information INA holds about them should contact the office. If a supporter discovers this information is incorrect, incomplete or out of date, INA should be notified, and the information will be corrected as soon as possible.

*Complaint and dispute resolution procedures:*

Any supporters who believe INA has breached their privacy rights in any way, or who would like to discuss this privacy policy should contact the Chief Executive Officer. INA will try to satisfy any questions and correct any errors or outdated information. Alternatively, supporters may lodge a formal complaint through INA's complaints handling procedure, which can be accessed here: <https://www.ina.org.au/complaints/>.

If INA does not answer privacy related concerns to the satisfaction of the complainant, they have the right to make a complaint to the Privacy Commissioner. The Privacy Commissioner may be contacted on 1300 363 992 or at [www.oiac.org.au](http://www.oiac.org.au)

**Contact Details:**

Postal address: PO Box 121, Mitcham, Vic 3132

Address: 196 Rooks Road, Vermont, VIC 3133

Phone: 03 9877 7177

Privacy Officer: Chief Executive Officer

Email: [ceo@ina.org.au](mailto:ceo@ina.org.au)

**Cross Reference**

1.6 Confidentiality Policy

1.9 Policy on Complaints

1.10 Policy on Donor Financial Information

2.2 Policy on Donor's Rights