

# **Privacy Policy and Guidelines**

## 1. Purpose

This Policy sets out the principles that the Order of the Knights of the Southern Cross Australia adopts in relation to the protection and handling of personal information.

### 2. Policy

- The Supreme Knight, in collaboration with the National Executive, is responsible for establishing policy and procedures for the protection and handling of personal information.
- The Order expects all members and employees to observe appropriate procedures for the protection and handling of personal information.
- The guidelines provide a point of reference for State organisations with regard to the protection and handling of personal information.

# 3. Information Collected by the Order

The Order may collect personal information about an individual, for example when an individual contacts the organisation, applies for a job or volunteer position, makes a donation, uses its services or joins its mailing list. The type of information the Order collects may include (but is not limited to):

- an individual's name and date of birth;
- an individual's contact details, such as home and email addresses, and telephone number:
- information about an individual's personal circumstances (eg: marital status, gender, job title and relevant information about their partner and children);
- information about an individual's background (eg: ethnicity, languages spoken, religious affiliation, parish attending, sacraments held and year obtained and current priest's name);
- bank or credit card details; and
- photographs (where an individual's identity is clear or can be reasonably ascertained from the relevant image).

All the above are not compulsory and the individual will have the option of not answering some of the personal circumstances and background information.

The Order may also monitor and record details of its interactions with an individual (including any contact made with the individual in person, by email, online or on the telephone), for dispute resolution and training purposes.

Where practical, the Order will collect personal information directly from the person but the Order may also collect personal information from third parties including other not-for-profit organisations, government agencies, information service providers or public sources.

From time to time, the Order may also receive unsolicited information, being information that it has not taken active steps to collect. Examples include misdirected mail, unsolicited employment applications and promotional flyers containing personal information.

When the Order receives such information, it will decide within a reasonable period whether it could have collected it pursuant to the requirements in the *Privacy Act 1988*. If it is determined that the Order could not have collected the information, it will be destroyed or de-identified as soon as practicable. Alternatively, if it is determined that the Order could not have collected the information and wish to retain it, it will be managed in accordance with the Order's obligations under the *Privacy Act 1988*.

#### 4. Guidelines

### 4.1 Use or Disclosure of Personal Information by the Order

The primary purposes for which the Order collects, uses and discloses personal information is to:

- provide, administer, improve and personalise its services;
- process donations and payments;
- identify individuals;
- assess applications for support or assistance;
- provide support and assistance to those in need;
- conduct surveys and research;
- to engage in political advocacy consistent with the Objects of the Order;
- protect the Order's lawful interests; and
- respond to members queries or concerns.

The Order may also collect, use and disclose personal information in connection with lawful information requests from courts, government agencies and lawyers and in connection with suspected fraud, misconduct or unlawful activity.

If the person is a donor, mailing list registrant, or volunteer, the Order may use their personal information to provide the individual with ongoing promotional materials and marketing communications about its events, services and fundraising initiatives by telephone, email, online or by other means (unless the person opts out or the Order is subject to legal restrictions).

The Order may not be able to do these things without the individual's personal information. For example, the Order may not be able to communicate with the individual or respond to their enquiries.

The Order may use the email details of members to assist in political advocacy for causes supported by the Order, however, a member can request to opt out of the use of their email for advocacy purposes completely, or in relation to a specific issue, and that request must be honoured.

# 4.2 Hold and Secure Personal Information

The Order manages personal information electronically and in hard copy form, at both the National Office and State Offices. In either case, a range of measures are implemented to protect the security of that personal information. The Order also takes reasonable steps to destroy or permanently de-identify personal information where it is no longer needed for a permitted purpose.

### 4.3 Information Disclosed Through the Website

### Using the Order's Website

When a person visits the Order's websites to read, browse or download information, the system may record information such as browser type, operating system, the date and time the person visits the websites, the pages accessed and any information downloaded. This information is used to analyse how people use the websites so that the Order can improve its interaction.

#### Cookies

The Order's websites may use an internet browser feature from time to time called 'cookies'. A cookie is a small data file that may be placed on a web user's computer (usually in the browser software folder) the first time that a computer visits a website that operates cookies. Cookies by themselves cannot be used to personally identify a person – they only identify the computer used to visit the Order's websites and help the organisation maintain the continuity of a person's browsing session by remembering their preferences for when they return.

# Third Party Websites

The Order's websites may contain links to other websites that are not owned or controlled by the Order. The Order is not responsible for the privacy practices or policies of those websites.

#### 4.4 Access to Personal Information

Individuals are encouraged to please contact either the National Office or the State Office if they have any queries or concerns about privacy or wish to access or correct any personal information the Order may hold about them. The Order may need to verify a person's identity.

If a person is making an access or correction request, please provide details of the particular information sought, to help to locate it. If the request is denied for access or correction, reasons will be provided. Where a requested correction to an individual's personal information is not made and they disagree, they may ask that a note of their requested correction with the information is made.

# 5. Document Control

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