

Barnardos Australia Privacy Policy

**This Privacy Policy sets out
Barnardos Australia's
position on privacy within
marketing and fundraising
through all channels**



**Barnardos
Australia**

Positioning Statement

Barnardos Australia values the relationship we have with you and we believe in protecting the confidentiality and security of individuals' personal information.

We are committed to ensuring the privacy of your personal information, Barnardos Australia is bound by the *Privacy Act 1988 (Cth)* and the Australian Privacy Principles. We are committed to being open and transparent and as such this Privacy Policy sets out Barnardos Australia's position on privacy within marketing and fundraising through all channels and Barnardos Australia's approach to the handling of individuals' personal information.

Collection

Introduction

Barnardos will only collect personal information about individuals where the collection is reasonably necessary for one or more of our functions or activities.

Types of information collected

Barnardos Australia collects personal information from volunteers, donors, prospects, suppliers and service providers where relevant to current business operations, including:

- contact information (both home and work) such as full name (first and last), e-mail address, current postal address and phone numbers
- date of birth
- employment details, including but not limited to job title
- details relating to donations made
- any relevant financial details for payment or billing information (including bank account details, credit card details, billing address and invoice details)
- opinions via surveys and questionnaires, if applicable

Collection method

Where possible, employees should collect personal information directly from the individual. However, it is permissible to obtain personal information from third parties such as contractors (including fundraising service providers) and list vendors.

Barnardos Australia will ensure that any contractual arrangements with a list owner or list broker will meet all requirements outlined in the Australian Privacy Principles. Until first use, the broker or, in the case of the data being supplied direct, list owner is responsible for the accuracy and the agreement of those people on the list for their details to be used by third parties.

If personal information about an individual is collected from a third party and it is unclear that the individual has consented to the disclosure of his or her personal information to Barnardos Australia, reasonable steps should be taken to contact the individual and ensure that he or she is aware of the collection. In most cases, this can take place simultaneously with the first use of the information by Barnardos Australia.

Collection notices

Where Barnardos Australia collects personal information from an individual, that individual should be provided with a collection notice.

Collection notices should generally be provided at the time the information is collected. Where this is not practical (for example, where information is collected from a third party), the collection notice should be provided at the time of first contact with the individual.

The collection notice should cover as many of the following matters as is reasonably practicable in the circumstances:

- Barnardos Australia's name and contact details
- If the personal information was collected from a third party source, how it was collected
- the purposes for which the information is being collected
- the consequences to the individual of not providing the information
- to whom Barnardos Australia usually discloses that kind of personal information
- information about how to find or obtain our Privacy Policy, as well as information on access to and correction of personal information and how an individual may complain about a breach of the Australian Privacy Principles
- whether we are likely to disclose personal information to overseas recipients, and if practicable, the countries where they are located.

Collection by third parties as agent for Barnardos Australia

Where personal information is collected by third parties as an agent for Barnardos Australia (for example, fundraising services suppliers collecting information for direct marketing):

- Wherever possible, our agent should provide Barnardos Australia's standard collection notice. Where Barnardos Australia has a contractual relationship with the agent or service provider, this requirement should be included
- Where the third party does not show Barnardos Australia's collection notice to the individual, a collection notice must be provided by Barnardos Australia at the time of the first use of the information (that is, the first contact with the individual by Barnardos Australia).

Sensitive information

In general, employees should attempt to limit the collection of sensitive information from individuals. However, sensitive information may need to be collected in order to deliver certain services. Barnardos Australia should only collect sensitive information from or about an individual if it is necessary to deliver a service to that individual.

Anonymity

Individuals can engage with Barnardos Australia on an anonymous basis, or using a pseudonym. If an individual makes this request, and Barnardos Australia does not need his or her personal information to deliver the service or program, it should not be collected. In this case, where practicable, individuals should be advised of any consequences of not providing personal information to Barnardos Australia.

Unsolicited personal information

Where an individual provides personal information that has not been solicited by Barnardos Australia, the employee who receives that information should determine whether it is reasonably necessary for one or more of Barnardos Australia's functions or activities. If it is not, the information should be destroyed as soon as is practicable.

Website usage information and cookies

When individuals access Barnardos Australia's main website and any other websites under the control of Barnardos Australia, the organisation may use software embedded in our website (such as Javascript) and may place small data files (or cookies) on the individual's computer or other device.

The purpose of these cookies is to collect information about which pages they view and how they reach them, what they do when they visit a page, the length of time they remain on the page, and how Barnardos Australia performs in providing content to them. This also helps Barnardos Australia to serve the individual more efficiently if they revisit the site.

Our display advertising partners then enable us to present you with retargeting advertising on other sites based on your previous interaction with our website. We do not presently associate such information with an identifiable person, and as such, the information so collected is not personal information. The techniques our partners employ do not collect personal information such as your name, email address, postal address or telephone number. You can visit <http://www.networkadvertising.org/> to opt out of our partners' targeted advertising.

Use

Use for primary purpose and certain secondary purposes

Employees must only use individuals' personal information for the primary purpose for which it was collected, a secondary purpose to which the individual has consented, or for a purpose related to the primary purpose of collection and the individual would reasonably expect the personal information to be used for such a purpose

Primary purposes (and secondary purposes for which consent is required) should be set out in collection notices, and may include:

- **Marketing:** to communicate with individuals about donations, products, services, campaigns, causes and events
- **Research:** to conduct and/or fund research into Barnardos programs and services or research into supporter attitudes
- **Volunteering and other support:** to enable individuals to assist us with volunteering, community fundraising, advocacy or other activities where we seek the community's assistance
- **Other issues:** communicating with individuals in relation to our operations, activities and objectives, to verify their identity, to improve and evaluate our programs and services and to comply with relevant laws.

Use for direct marketing

General principles

Employees may use individuals' personal information for direct marketing purposes, but only where:

- the direct marketing communication contains a prominent statement that the individual may opt out of receiving that type of communication, and
- the relevant individual has not made such a request.

Consent for direct marketing

Individuals whose personal information is collected using a collection notice that references this Privacy Policy are taken to consent to the use of their personal information for direct marketing purposes, unless they have specifically opted out.

Opting out of direct marketing

Email direct marketing communications should generally contain an ‘unsubscribe’ link that provides individuals with the opportunity to opt out of direct marketing communications. In other circumstances, individuals who do not wish to receive direct marketing communications from Barnardos Australia may contact us at Barnardos Australia, GPO Box 9996, Sydney NSW 2001, 1800 061 000, info@barnardos.org.au to opt out or use the opt out provided on the direct marketing material.

Employees must take all necessary steps to opt such individuals out of direct marketing communications. Requests to opt out of direct marketing communications should be treated in the first instance as a request to opt out of the particular campaign or event to which the communication relates. However, individuals must be given the opportunity to contact Barnardos Australia (for example, by phone) to opt out of all direct marketing communications, across all programs, events and channels.

Individuals who have opted out of direct marketing may still receive administrative emails or phone calls, such as reminders to bank funds raised.

Removal of opt-outs

Individuals who register for events, make a donation or otherwise provide their personal information for marketing-related purposes after they have previously opted out of direct marketing communications should be taken to have ‘opted in’ once again and may receive direct marketing communications. However, all such direct marketing communications must give the individual the opportunity to opt out as described above.

Business-to-business relationships

Where an individual provides his or her business contact details (such as a business card), this should be treated as implied consent to be contacted for business purposes, and no additional collection notice is required. However, the individual should not be contacted in relation to marketing activity in their individual capacity unless he or she has provided specific consent.

Disclosure

Permitted disclosure

Employees may disclose individuals' personal information where the disclosure is for the primary purpose for which the information was collected, a secondary purpose to which the individual has consented, or for a purpose related to the primary purpose of collection and the individual would reasonably expect the personal information to be used or disclosed for such a purpose

Usual disclosures

Individuals whose personal information is collected using a collection notice that references this Privacy Policy are taken to consent to the following disclosures:

- Charitable and other like-minded organisations, including third party service providers who facilitate the sharing of information between such types of charitable or like-minded organisations (including data collectives).
- Contractors and service providers who perform services on our behalf, such as mailing houses, printers, information technology services providers (including onshore cloud computing service providers), data matching and data washing service providers, database contractors and telemarketing agencies.

Cross-border disclosures

Barnardos Australia may use data hosting facilities or enter into contractual arrangements with third party service providers to assist with providing our goods and services. As a result, personal information provided to Barnardos Australia may be transferred to, and stored at, a destination outside Australia, including but not limited to New Zealand, Netherlands and China.

Personal information may also be processed by staff or by other third parties operating outside Australia who work for us or for one of our suppliers or agents. For other collections, employees must take reasonable steps to ensure that individuals are made aware of any likely cross-border disclosures of personal information and consent to such disclosures. Employees should consult with the Privacy Officer if they are unsure what may be considered reasonable in the circumstances.

Individuals whose personal information is collected using a collection notice that references this Privacy Policy are taken to consent to the disclosure, transfer, storing or processing of their personal information outside of Australia in the circumstances described. These individuals understand and acknowledge that countries outside Australia do not always have the same privacy protection obligations as Australia in relation to personal information.

Data Security

Maintaining security of personal information

Barnardos Australia will take reasonable steps to help ensure the security of personal information, including by:

- making sure that personal information is accurate, complete and up to date
- protecting personal information from misuse, loss, unauthorised access, modification or disclosure both physically and through computer security methods
- destroying or permanently de-identifying personal information if it is no longer needed for any authorised purpose.

Barnardos Australia complies with the Payment Card Industry standards, which governs the organisation's handling of payment card information.

Responding to a data security breach

The manager of the relevant unit, in consultation with the Privacy Officer is responsible for responding to the unauthorised access or disclosure of personal information in a manner which constitutes a data security breach. The exact nature of the response will depend on the circumstances but is likely to include

- taking reasonable steps to contain the data security breach
- undertaking a preliminary assessment of the data security breach, and
- where appropriate following the results of that assessment, implementing appropriate changes.

Where required by law, the Privacy Officer will notify the Australian Information Commissioner and will assist employees to notify individuals affected by a data security breach.

Access and Correction

Access

Individuals are entitled to access any personal information held by Barnardos Australia about them, except in some exceptional circumstances provided by law. Where an individual requests access to their personal information, Barnardos Australia should provide it. However, Barnardos Australia may limit or deny access to personal information where providing such access is unreasonably burdensome or expensive under the circumstances, or as otherwise permitted by the Australian Privacy Principle's.

If there is an operational reason why the employee does not wish to provide the information, the employee should seek advice from the Privacy Officer.

Correction

Individuals are entitled to seek to have personal information about them corrected. If an individual makes such a request, Barnardos Australia should correct the information. If there is an operational reason why the employee does not wish to correct the information, the employee should seek advice from the Privacy Officer.

Minors

Barnardos makes no active effort to collect personal information from children under the age of 18. Children who do wish to submit information to Barnardos should have permission from their parent or legal guardian.

Changes to Barnardos Privacy Policy

This Privacy Policy was last updated in March 2014 . Any changes made to the privacy policy will be displayed on the Barnardos Australia website and made clear to donors and supporters through the next available and most appropriate communication. It applies to all Barnardos Australia employees including casual staff, as well as volunteers. It does not form part of any employee's contract of employment and does not create or confer any entitlement or benefit on any employee who was not entitled to such entitlement or benefit at the time this policy came into operation.

Concerns/Disputes

Respecting your privacy is very important to us and we make every effort to ensure this occurs. However, if you believe we have breached your privacy rights in any way, or you would like to discuss any issues you may have with our privacy policy we urge you to contact our Privacy Officer:

Sue Tregagle

Barnardos Australia GPO Box 9996 SYDNEY NSW 2001

Telephone: (02) 9218 2300 or email: SueTreg@barnardos.org.au

We will try to satisfy any questions that you have and correct any errors on our part.

If we do not answer your concerns to your satisfaction you have the right to make a complaint to the Privacy Commissioner. The Privacy Commissioner's contact details are:

Telephone 1300 363 992 (for the cost of a local call anywhere in Australia)

TTY 1800 620 241 (this number is dedicated for the hearing impaired only)

Post GPO Box 5218 Sydney NSW 1042

Facsimile +61 2 9284 9666

E-mail privacy@privacy.gov.au