

PRIVACY POLICY

1 BACKGROUND

Australian Lutheran World Service ABN 36 660 551 871 and its related entities such as the Lutheran Church of Australia, (which is referred to throughout this manual as **we, us, our** or **ALWS**) are committed to protecting the privacy of your personal information in accordance with the *Privacy Act 1988 (Cth)*, including the Australian Privacy Principles (**APPs**).

This Policy has been updated to promote compliance with the *Privacy ACT 1988 (Cth)* in light of changes introduced in February 2018 and guidance issued by the OAIC and is intended to provide a general overview of our processes for the handling of personal information. Other policies may apply instead of or in addition to this Privacy Policy in certain circumstances.

2 DEALINGS WITH ALWS

By using our website at www.alws.org.au and/or providing your personal information to us you consent to us handling your personal information in accordance with this Privacy Policy.

3 COLLECTION OF YOUR PERSONAL INFORMATION

We may collect personal information about you when you are dealing with us. The type of personal information we collect will depend on how you deal with us.

Generally, we will collect your name, address, telephone number and email address. In certain circumstances, we may also collect other personal and sensitive information from you. For example::

- if you attend one of our study tours or volunteer programs, we will collect medical information so that we are aware of any medical conditions in an emergency; or
- if you are applying for a position with ALWS then we may collect your resume, qualifications, skills, education provider and history, work history, residency status and drivers licence numbers).

We will only collect information that is necessary for our normal functions. We collect your personal information directly from you, unless it is impracticable or unreasonable to do so. From time to time we may collect personal information about you from third parties (for example, from an organisation that you work with or publicly available sources).

If you provide us with personal information about a third party you represent we collect it on the basis that you have that person's consent for us to collect and handle their personal information in accordance with this privacy policy.

If we are unable to collect the personal information we require, or the information provided is incorrect or incomplete, this may affect our ability to provide products or services to or accept donations from you.

4 PURPOSES FOR WHICH PERSONAL INFORMATION IS COLLECTED, HELD, USED AND DISCLOSED

We will use and disclose your personal information for the purposes for which we collected it, and for other related purposes that you would reasonably expect.

Generally, these purposes include:

- (a) Responding to your enquiries;
- (b) Providing you information about ALWS' fundraising activities, volunteer programs and Gifts of Grace;
- (c) Ensuring the appropriate people and administrative sections within the Lutheran Church of Australia (LCA) such as Boards, Committees, Pastors and Treasurers can be contacted;
- (d) Ensuring ALWS can effectively and efficiently administer our human resources (employment processes and appraisals);
- (e) Seeking donations for our fundraising campaigns;
- (f) Administering our volunteering opportunities;
- (g) Administering our Gifts of Grace program;
- (h) Exercising due diligence in the distribution of economic resources (loans and grants);
- (i) Exercising due diligence in the management of complaints;
- (j) Undertaking referee checks when recruiting new staff or screening individuals for suitability for study tours or other activities which require screening to work with children (refer to the ALWS Child Protection Policy);
- (k) Conducting our day to day operations; and
- (l) As otherwise required or authorised to do so by law (e.g. conducting anti-terrorism checks).

By providing us with your personal information, you consent to us using your personal information for these purposes. You agree that we may send you such information by post or by electronic means (including e-mail and SMS).

You can opt-out of marketing and promotional communications at any time using an opt-out mechanism in one of our communications, or by contacting ALWS via the details shown below.

ALWS may disclose your personal information to:

- (a) LCA Officials, Boards and Committees of the LCA (with the permission of the individual - the circumstances for sharing of such information would usually be very limited);
- (b) Pastors and Congregational Treasurers of the LCA with the permission of the individual;
- (c) outsourced service providers who manage services provided to donors;
- (d) ALWS professional advisers, including our auditors;
- (e) anyone the provider authorises to receive it; and/or
- (f) Government and regulatory authorities and other authorities, or as required or authorised by law.

5 SENSITIVE INFORMATION

The Privacy Act categorises some types of personal information as 'sensitive information' and applies differing standards for the way in which that information is handled by us. Sensitive information includes personal information about a person's racial or ethnic origin, political opinions, membership to a political association, religious beliefs or affiliations, philosophical beliefs, membership to a professional or trade association or trade union, sexual preferences or practices, criminal record, health information, genetic information or biometric information.

We will only collect 'sensitive information' with your consent. We will assume that you have consented to us collecting all information which is provided to us by you for use in accordance with this policy, including any 'sensitive information', unless you tell us otherwise at the time you provide it to us.

6 STORAGE AND SECURITY OF YOUR PERSONAL INFORMATION

We may hold your personal information in electronic formats or in hard copy. We take reasonable steps to securely store your personal information to ensure it is protected from unauthorised access, modification and disclosure, and from other types of misuse, interference and loss.

We will take reasonable steps to destroy or permanently de-identify your personal information when we no longer require it for any purpose for which it was collected. We may retain your personal information for as long as necessary to comply with any applicable law, for insurance and corporate governance purposes, for the prevention of fraud and to resolve disputes. Your personal information may also be retained in our IT system back-up records.

Financial details, including credit card details and related personal information gathered whilst in the process of conducting an online purchase on our website will be used for credit card authorisation purposes. This information will be shared with our payment processing provider in connection with your purchase. All online purchases are conducted using 128-bit SSL (secure sockets layer) encryption directly with our payment processing authority. The transfer of data over the Internet is inherently insecure. We cannot guarantee the security, during transmission, of any personal information provided to us via our website at www.alws.org.au. Please bear this in mind when transmitting information by this means to us.

7 ACCESS AND CORRECTION OF YOUR PERSONAL INFORMATION

You may lodge a request to correct personal information that we hold about you. If you believe it is inaccurate, incomplete, out-of-date, irrelevant or misleading, please contact our Privacy Officer via the contact details shown below.

You may request that we provide you with access to the personal information we hold about you. Generally, we will provide you with access, except in limited circumstances and where the APPs permit us to deny access (e.g. giving access is unlawful). Any such requests must be made in writing to ALWS via the details shown below. Under the APPs we are permitted to charge you a reasonable amount for providing access to your personal information. Please note that no fee will be incurred for requesting access, and if your request for access is accepted we will inform you of the costs (if any) that will be payable for providing access if you proceed with your request, for example, staff costs in searching for, locating, retrieving and deciding on what information to provide, staff costs to reproduce and send the information, postage costs, material costs, and costs associated with using an intermediary.

8 ALWS WEBSITE

Our website at www.alws.org.au uses cookies. We do not use the information stored in those cookies to collect information about you or your computer. The cookies are used for statistical purposes and to assist with your use of the website.

We may also collect click-stream data when you use the website, such as the date and time of your visit, the webpages you accessed and items you downloaded, your top-level domain name, your IP address, the type of browser and operating system you are using and the addresses of the websites you come from and move to. This information is collected for statistical purposes to assist us to find out how our website is used and navigated and to improve our website.

ALWS' website and emails and other material provided by ALWS may contain links to or addresses for third party websites. We are not responsible for the privacy, security or handling of your personal information via those websites. You should review the privacy policy and terms of use for those websites each time you visit them.

9 OVERSEAS DISCLOSURE OF YOUR PERSONAL INFORMATION

Generally, we will not disclose your personal information to recipients located outside of Australia, except with your consent or where we are otherwise permitted or required to do so by law.

10 CHANGES TO OUR PRIVACY POLICY

We may amend, modify or replace this Privacy Policy at any time. Updates will take effect from the date the amended, modified or replacement Privacy Policy is published on our website, or as otherwise notified to you. You should review our Privacy Policy each time you visit our website or provide us with personal information.

11 COMPLAINTS

You may lodge a complaint with us if you believe we have handled your personal information other than in accordance with the APPs. To do so please contact our Privacy Officer via the contact details below. We will confirm receipt of your complaint and set out the timeframe we require to investigate your complaint and provide you with a response. We will endeavor to respond as quickly as possible, which generally, will be within 14 days of receiving your complaint.

12 CONTACT US

If you would like further information about the way we manage your personal information or if you have a complaint, please contact ALWS by telephone on +61 2 6021 5329, by mail at ALWS, PO Box 488, Albury NSW 2640, or by email at alws@alws.org.au.

13 REVIEW

This policy will be reviewed at least every three years.