

## Privacy Policy

### Your privacy is important

This statement outlines *Asian Aid's* policy on how *Asian Aid* uses and manages personal information provided to or collected by it.

*Asian Aid* is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act and is compliant with the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

*Asian Aid* may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to *Asian Aid's* operations and practices and to make sure it remains appropriate to the changing legal environment.

This privacy policy assumes that you are a resident of Australia. If you are not a resident of Australia, please contact us for more information regarding how we treat your personal information.

### What kind of personal information does the *Asian Aid* collect and how does the *Asian Aid* collect it?

The type of information the *Asian Aid* collects and holds includes (but is not limited to) personal information, including sensitive information, about:

- Company employees.
- Board directors.
- Volunteers.
- Donors.
- Beneficiaries.
- Partner staff.

### Personal Information you provide:

*Asian Aid* will generally collect personal information held about an individual by way of phone calls, forms (paper and web), emails and meetings. You do have the right to seek to deal with us anonymously or use a pseudonym, but in almost every circumstance it will not be practicable for us to deal with you or provide any services to you except for the most general responses to general enquiries, unless you identify yourself.

### Personal Information provided by other people:

In some circumstances *Asian Aid* may be provided with personal information about an individual from a third party, for example personal information regarding program beneficiaries.

### In relation to employee records:

Under the Privacy Act the Australian Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to *Asian Aid's* treatment of an employee record, where the treatment is directly

related to a current or former employment relationship between *Asian Aid* and the employee. However, *Asian Aid* must provide access and ensure compliance with the [Health Records and Information Privacy \(HRIP\) Act 2002 \(NSW\)](#) and [Privacy and Personal Information Protection \(PPIP\) Act 1998 \(NSW\)](#).

### **How will *Asian Aid* use the personal information you provide?**

*Asian Aid* will use personal information it collects from you for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected, or to which you have consented.

In relation to direct marketing, *Asian Aid* will use your personal information for direct marketing where you have provided that information, and you are likely to expect direct marketing: only then you will be sent direct marketing containing an opt out. If we use your personal information obtained from elsewhere, we will still send you direct marketing information where you have consented, and which will also contain an opt out. We will always obtain your consent to use sensitive information as the basis for any of our direct marketing.

We may use video surveillance for security purposes and the footage will be used only by *Asian Aid* and by the providers of our security services for security purposes. Surveillance videos are not used by *Asian Aid* for other purposes and the footage is not publicly available. Surveillance cameras are not located in any bathrooms or change room facilities.

### **Job applicants, staff members and contractors:**

In relation to personal information of job applicants, staff members and contractors, *Asian Aid's* primary purpose of collection is to assess and (if successful) to engage the applicant, staff member or contractor, as the case may be.

The purposes for which *Asian Aid* uses personal information of job applicants, staff members and contractors include:

- for insurance purposes.
- child protection and safeguarding purposes.
- re-call for future employment, consulting, and contracting purposes.
- to satisfy *Asian Aid's* legal obligations.

Where *Asian Aid* receives unsolicited job applications these will usually be dealt with in accordance with the unsolicited personal information requirements of the Privacy Act.

### **Volunteers:**

*Asian Aid* also obtains personal information about volunteers who assist *Asian Aid* in its functions or conduct associated activities, such as to enable *Asian Aid* and the volunteers to work together.

### **Marketing and fundraising:**

*Asian Aid* treats marketing and seeking donations for the future growth and development of *Asian Aid* as important. Personal information held by *Asian Aid* may be disclosed to an organisation that assists in *Asian Aid's* fundraising, for example, *Asian Aid's* chosen providers for Email Direct Marketing (EDM).

## Who might *Asian Aid* disclose personal information to?

*Asian Aid* may disclose personal information, including sensitive information, held about an individual to:

- government departments,
- people providing services to *Asian Aid*,
- anyone you authorise *Asian Aid* to disclose information to.

## Sending information overseas:

*Asian Aid* will not send personal information about an individual outside Australia without:

- obtaining the consent of the individual (in some cases this consent will be implied); or
- otherwise complying with the Australian Privacy Principles or other applicable privacy legislation.

We do not use overseas providers of IT services including servers and cloud services.

## How does *Asian Aid* treat sensitive information?

In referring to 'sensitive information', *Asian Aid* means:

“Information relating to a person’s racial, ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual orientation or criminal record, that is also personal information; and health information about an individual”.

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

## Management and security of personal information

*Asian Aid*'s staff are required to respect the confidentiality of personal information and the privacy of individuals.

*Asian Aid* has in place steps to protect the personal information *Asian Aid* holds from misuse, loss, unauthorised access, modification, interference, or disclosure by use of various methods including locked storage of paper records and passworded access rights to computerised records.

We have a data breach response plan, which we would follow in the unlikely event of a privacy or data breach.

When you use our website, having your cookies enabled will allow us to maintain the continuity of your browsing session and remember your details when you return. We may also use web beacons, Flash local stored objects and JavaScript. If you adjust your browser settings to block, reject or delete these functions, the webpage may not function in an optimal manner. We may also collect information about your IP address, although this may not identify you.

## Updating personal information

*Asian Aid* endeavours to ensure that the personal information it holds is accurate, complete, and up to date. A person may seek to update their personal information held by *Asian Aid* by contacting the Supporter Services Team of *Asian Aid* at any time.

The Australian Privacy Principles require *Asian Aid* not to store personal information longer than necessary. In particular, the Health Records and Information Privacy (HRIP) Act 2022 (NSW) imposes certain obligations about the length of time health records must be stored.

You have the right to check what personal information *Asian Aid* holds about you.

Under the Commonwealth Privacy Act, an individual has the right to obtain access to any personal information which *Asian Aid* holds about them and to advise *Asian Aid* of any perceived inaccuracy. There are some exceptions to this right set out in the applicable legislation. To make a request to access any information *Asian Aid* holds about you, please contact the Supporter Services Team in writing.

*Asian Aid* may require you to verify your identity and specify what information you require. Although no fee will be charged for accessing your personal information or making a correction, *Asian Aid* may charge a fee to retrieve and copy any material. If the information sought is extensive, *Asian Aid* will advise the likely cost in advance.

### How long will *Asian Aid* keep my information?

Under our destruction and de-identification policies, your personal information that is no longer required will be de-identified or destroyed. In many circumstances, however it will be kept for marketing purposes, as you will have consented to that in writing with us.

### Enquiries and privacy complaints

If you would like further information about the way *Asian Aid* manages the personal information it holds, please contact the Supporter Services Team. If you have any concerns, complaints or you think there has been a breach of privacy, then also please contact the Supporter Services Team, who will first deal with you usually over the phone. If we then have not dealt satisfactorily with your concerns, we will meet with you to discuss further. If you are not satisfied with our response to your complaint within 30 days from this meeting, then you can refer your complaint to the Office of the Australian Information Commissioner via:

- email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)
- phone: 1300 363 992
- fax: +61 2 9284 9666

### Policy Amendment Table

Version #	Date	Short description of amendment	Approved by:
2.0	26/09/2023	Review to ensure alignment with Australian Privacy Principles; review to data retention and data security requirements; clearer separation of sensitive and personal information particularly regarding management of health information; inclusion of requirements regarding disclosing personal information to overseas recipients; review of guidelines for storage of personal information.	CEO/Board

## APPENDIX I

### Definitions

<b>Primary Function</b>	Refers to the domestic and international program deliverables of the organisation.
<b>Employee Record</b>	Means a record of personal information relating to the employment of an Asian Aid employee.
<b>Personal Information</b>	Means information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.
<b>Sensitive Information</b>	Has the meaning set out in the Privacy Act. Sensitive information includes health information and information about religious beliefs, race, gender, and others.
<b>Data Destruction</b>	Refers to the process of permanently destroying digital data stored on electronic devices such as computers, hard drives, memory cards, and smartphones. The goal of data destruction is to protect individuals, organizations, and governments from data breaches, identity theft, and other various information security threats.
<b>Data De-identification</b>	Is a process which involves the removal or alteration of personal identifiers, followed by the application of any additional techniques or controls required to remove, obscure, aggregate, alter and/or protect data in some way so that it is no longer about an identifiable (or reasonably identifiable) individual.
<b>Privacy Act</b>	Was introduced to promote and protect the privacy of individuals and to regulate how Australian Government agencies and organisations with an annual turnover of more than \$3 million, and some other organisations, handle personal information. The Privacy Act also regulates the privacy component of the consumer credit reporting system, tax file numbers, and health and medical research.

