



## **Privacy Policy**

This Privacy Policy sets out how Tweed Coast Community Baptist Church (the church) manages personal information. The church is bound by the Australian Privacy Principles in the Privacy Act 1988 (Cth). The church may update or amend this policy from time to time to cover any changes in law, practice or policy. Any updates of this policy will be posted on our website.

### **Definitions**

Personal Information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- a) whether the information or opinion is true or not; and
- b) whether the information or opinion is recorded in a material form or not.

Sensitive Information means:

- a) information or an opinion about an individual's:
  - i. racial or ethnic origin; or
  - ii. political opinions; or
  - iii. membership of a political association; or
  - iv. religious beliefs or affiliations; or
  - v. philosophical beliefs; or
  - vi. membership of a professional or trade association; or
  - vii. membership of a trade union; or
  - viii. sexual orientation or practices; or
  - ix. criminal record.

The church's Privacy Policy applies to both personal and sensitive information collected by the church where no other privacy policy applies.

### **Information that we collect from you and hold about you**

We collect and hold personal information such as:

- Name
- Title
- Address
- Phone number
- Email
- Personal and family circumstances

Also, we collect personal information about your interactions with us for example, when you make a purchase from us, when you attend our events and when you phone us and this information is held in our database, registrations form files and attendance lists.

## **How is information Collected?**

- When you complete paper and electronic forms
- When you complete giving envelopes
- When you subscribe to the church newsletter
- When you communicate via SMS, email, telephone or social media
- When you voluntarily provide us with details
- During interviews, meetings and discussions - formal and informal, between you and staff members and volunteers.

We may also collect your personal information from third parties including:

- Australian Federal Police.
- Department of Child Protection.

## **Purpose of collection, holding, use and disclosure of personal information**

The purpose of collection, holding, use and disclosure of the personal information is to fulfil the ministry and administrative functions of the church. This may include things such as:

- to contact you;
- to comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator; or in cooperation with any government authority
- to produce the church's Annual Report;
- to sign you up to our newsletters and invite you to our events that may be of interest and relevance to you; or
- to help us work with you as a volunteer.

## **Who may we disclose your information to?**

We may disclose your personal information to the following groups:

- to our employees;
- to our contractors who perform tasks directly on our behalf;
- insurance companies and insurance related entities e.g. claims providers, insurers etc;
- auditors;
- anyone you authorise us; or
- anyone to whom we are required to by law.

We do not pass on personal information to any third parties other than those stated in this policy, or publish them in our publications or on our website without explicit permission. We do not buy or sell personal information from or to third parties other than described in this Privacy Policy

## **Sensitive information**

We will only use or disclose sensitive information for the purpose for which we collected it or for a directly related secondary purpose, unless you give your consent to another use or we are required or permitted by law to use or disclose the sensitive information.

## **Videos/Photographs**

Both video and still photography are an active part of the church life, activities and services. The church uses video and still photography for church related purposes or promotions. If you would like to have a video or still image removed from any material, please contact us using the contact details set out below.

## **Your right to information**

Whilst we keep all personal information about you secure from others, you may request access to your information at any time.

Your individual information can be accessed by contacting the Church Secretary by writing to PO Box 1 Bogangar NSW 2488, phoning (02) 6676 3011 or emailing [secretary@tweedccc.com.au](mailto:secretary@tweedccc.com.au). Also, if you believe that a correction is required, please contact us.

We may ask for verification of your identity when you request access to your information. If you wish to have your personal information deleted, we will take reasonable steps to delete it unless we need to keep it for legal, auditing or internal risk management reasons.

Access may be denied if such access would be unlawful, frivolous or vexatious; infringe on the privacy of other individuals; pose a serious and imminent threat to the life or health of any individual; interfere with existing or anticipated legal proceedings; or other valid reasons for exclusion in line with relevant legislation.

If we use personal information in ways other than as stated in this policy, we will ensure we comply with the requirements of Privacy law.

## **Complaints about a breach of the Australian Privacy Principles**

Any complaints in relation to the breach of the Australia Privacy Principles can be made to the Church Secretary by writing to PO Box 1 Bogangar NSW 2488, phoning (02) 6676 3011 or emailing [secretary@tweedccc.com.au](mailto:secretary@tweedccc.com.au). We will keep you updated on the progress of correcting the breach. The church will investigate the complaint and will notify the individual of its decision and any action taken as soon as possible.

If you are not satisfied with our response to your complaint, you can contact The Office of the Australian Information Commissioner [www.oaic.gov.au](http://www.oaic.gov.au)

## **How we keep your information secure**

Information is kept in our electronic database or as hard copy filed as forms. These are kept in secure premises. The church uses data hosting facilities and a third party service provider to assist in providing our services. As a result, your personal information may be transferred to, and stored at a destination outside Australia.

## **How long do we keep your information**

We will keep your personal information for as long as it is required and in accordance with the Law and other legal requirements. If you decide you no longer wish to receive communication from us, the church will take such steps as are reasonable in the circumstances to destroy or de-classify the information in a lawful and secure manner.

## **Eligible Data Breaches**

The Privacy Act stipulates reporting and management requirements for certain data breaches, known as 'eligible data breaches'. An 'eligible data breach' occurs when personal information held by us is lost or unauthorised access, disclosure, or other interference has taken place, and the access or disclosure would likely result in serious harm to the individuals to whom the information relates. 'Serious harm' may include physical, emotional, economic, and financial harm, as well as reputational damage.

Examples of a data breach include: -

- a) A device containing personal information is lost or stolen;
- b) The church's databases containing personal information is hacked;
- c) The church mistakenly provides personal information to the wrong person.

If we suspect there has been an eligible data breach, we will carry out an assessment within 30 days of the suspicion to determine whether or not a data breach has occurred. The Diaconate is responsible for determining if an eligible data breach has occurred. In the case of an eligible data breach, the church will take all steps to immediately contain the breach, determine who needs to be notified of the breach (whether internally and/or externally), what the best form of notification is, and how this process will be managed.

## **Overseas Recipients**

The church may disclose personal information to an overseas recipient, for example, to facilitate cross cultural mission. The church will not send personal information overseas without:

- obtaining the consent of the individual (which may be implied);
- otherwise complying with the Australian Privacy Principles.

The church may also store personal information in the 'cloud' which may mean the information is stored on servers overseas.

## **Third Party Websites**

Our website includes hyperlinks to, and details of, third party websites. We have no control over, and are not responsible for, the privacy policies and practices of third parties.

## **Evaluation**

This policy will be reviewed annually.

Version 1. Approved by the Diaconate on **10 July 2023**