



St Vincent de Paul Society
(TASMANIA) INC

good works

Privacy Policy

Version 1.0
11 February 2023

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1 Introduction

1.1 Policy Introduction

This document sets out the policy and guidelines that St Vincent de Paul Society (Tasmania) Inc. uses to ensure the legislative obligations for collecting, using, storing, and disclosing personal information are met.

2 Definitions

Within this policy and all related governance documents, the following definitions apply:

Society means the *St Vincent de Paul Society (Tas) Inc.* which is an incorporated entity under the Associations Incorporated Act 1964 (TAS).

National Council means the superior Council of the Society in Australia.

Overseas Development Program means the work undertaken with partners of the International Confederation of the Society of St Vincent de Paul to carry out the good works of the Society. The Overseas Development Program's good works include the following initiatives:

- Twinning and Grants
- Projects
- Humanitarian Assistance; and
- Assist A Student.

Opt in means an individual can consent to have their information stored and used by the Society.

Opt out means an individual can decline consent to have their information stored and used by the Society.

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not. This information generally includes, but is not limited to:

- name, date of birth, contact details, and background information
- sensitive information regarding genetics, race, political opinion or membership, religion, philosophical beliefs, union membership, sexual preference and criminal record; and
- health information about physical or mental health or a disability an individual has had at any time, an individual's express wishes about future provision of health services to them, any health service that has been or is to be provided to an individual, any personal information collected to provide or in providing a health service.

Primary purpose means the purpose for the information originally being collected.

Secondary purpose means the use or disclosure of information for the purpose in which it was not originally collected.

3 Policy Statement

3.1 Commitment

1. As a major Tasmanian charity, the Society is committed to protecting individuals' personal information, and does so in accordance with all applicable Commonwealth, State or Territory laws. At a minimum, this includes the **Privacy Act 1988** (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**) within Schedule 1 of the Privacy Act.
2. The adoption of the APPs supports the Society's commitment to promoting mutual trust, respect, integrity, equity and fair treatment of all people who come in contact with the Society.
3. The Society is committed to ensuring:
 - the practice of fair and open communication practices;
 - the accurate, current and complete storage of information; and
 - that individuals have a right to access and, where necessary, to correct information about them that is held by the Association.

3.2 Personal Information the Society may Collect

4. In certain circumstances, the Society may collect an individual's personal information. Examples include, when contacting the Society, when applying for a job or a volunteer position, when making a monetary donation, when using one of the Society's services or when requesting to join a Society mailing list.
5. The types of information the Society collect may include (but is not limited to):
 - name
 - date of birth
 - contact details, such as home and email addresses and telephone number(s)
 - in some instances, the Society may ask for personal information about an individual's circumstances (e.g. marital status, gender, job title and relevant information about next of kin or dependents details)
 - background information (e.g. ethnicity, languages spoken, medical history, health and disability information)
 - bank or credit card details, and
 - photographs or videos (where an individual's identity is clear or can be reasonably ascertained from the relevant image).
6. The Society may also monitor and record details of interactions with individuals (including any contact in person, by email, online or on the telephone), for training purposes or during a

- dispute resolution process.
7. Where practical, the Society will collect personal information directly from an individual. However, the Society may also collect personal information from third parties including a carer, guardian, advocate or authorised representative, other not-for-profit organisations, government agencies, information service providers or public sources for direct marketing purposes.
 8. The primary purpose for which the Society may collect, use and disclose personal information is to identify an individual so that the Society can:
 - assess and respond to requests for support or assistance
 - keeping individual's records and contact details up-to-date
 - provide, administer, improve and personalise the Society's services, programs, goods, website and online presence
 - meet funding, professional and legal obligations in the provision and reporting of services and programs
 - comply with industrial relations, human resources and workplace health and safety obligations (including medical information, emergency contacts, leave details, workplace surveillance information, including video, work emails and private emails when using work email addresses and internet browsing history)
 - process any monetary donations or payments made to the Society
 - assess employee or volunteer applications
 - conduct surveys, research and advocacy work
 - protect the Society's lawful interests
 - comply with any legal requests, including law, court or tribunal orders and regulatory authority requirements
 - respond to queries, concerns or complaints, and
 - engage in direct-marketing activities including the promotion of the Society's services, programs and fundraising activities, but only if consent is provided by 'opting in' to personal information being used for this purpose.
 9. In these instances, the use and disclosure of personal information is considered reasonably necessary for the Society to carry out its work.
 10. Individuals can decline to provide personal information, but when an individual declines to provide personal information, the Society may not be able to:
 - enter into a contract
 - process a monetary donation, including issuing a tax-deductible receipt for monetary donations over AUD \$2.00
 - engage an individual as an employee, contractor, member or volunteer
 - respond to queries, concerns or complaints
 - meet legal, professional or reporting obligations, provide the requested service to the same standard or at all or make referrals to another service, and

- deliver the related program to the same standard or at all.
11. Australian privacy law allows the Society to use or disclose an individual's personal information for the reason/s it was collected (primary purposes).

3.3 How the Society Collects Personal Information

12. Where practical, the Society prefers to collect personal information directly from an individual.
13. If this is not possible, the Society may collect personal information from third parties. Examples of third parties includes a carer, guardian, advocate or authorised representative and organisations that Society's partners with to deliver services (government and non-government). The Society will only collect your personal information from a third party where it is permitted by the Privacy Act.
14. Where the Society collects personal information from third parties, the Society will advise the individual, or their representative, of the circumstances of the collection in a timely manner.
15. The Society will take reasonable steps to ensure that personal information is accurate, up to date and complete.
16. The primary purpose of the Society in Australia is to walk alongside those who need a hand up especially those in necessitous circumstances. In order to provide support to individuals and families in need, the Society raises donations through different fundraising and donation methods. Personal information may be used for direct marketing activities including the promotion of the Society's good works, services and fundraising activities.
17. Raising donations is generally conducted by the Society's State Council. However, National Council also receives donations for the purpose of promoting its Objects, manages national natural disaster fundraising activities on behalf of the Society in Australia and operates an Overseas Development Program.
18. The Society may also send marketing information regarding upcoming events, products, services and fundraising activities but will only do so if an individual chooses to 'opt in' and consents to receiving marketing information.
19. The 'opt in' option:
 - will be concise, in plain English and user-friendly
 - specific, obvious and prominent and not bundled with other terms and conditions.
20. When individuals chose the 'opt out' option, the Society will not store personal information in its systems or send unsolicited communications except for the purpose of sending a tax deductible receipt for monetary donations over AUD \$2.00.
21. From time to time, the Society 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.
22. If the Society receives such information, it will decide within a reasonable period whether it could have been collected pursuant to the requirements in the APPs. If the Society determines that it should not have collected the information, the information will be destroyed or de-identified as soon as practicable.
23. Alternatively, if is determined that the Society wishes to retain unsolicited information, the

Society will deal with this information in accordance with its obligations under the APPs.

3.4 When and how the Society Seeks Consent

24. The Society requires consent when collecting, using and disclosing personal information from individuals. These circumstances may include, but are not limited to, when the Society works with, facilitates or advocates on an individual's behalf to organise or provide health, accommodation, financial, emergency relief, legal or other related services. This also includes when taking photos, videos or images of individuals to share the Society's good works online and in publications.
25. The Society also requires consent when collecting, using or disclosing personal information for a secondary purpose. These circumstances include, but are not limited to, sharing information with St Vincent de Paul Society entities located in other Australian states and territories.
26. In these instances, the Society will only collect, use or disclose personal information for a secondary purpose in accordance with the Privacy Act or applicable State or Territory law.
27. When requiring consent, the Society will:
 - where possible, seek consent directly from an individual. If this is not possible, consent will be sought from a nominated person or representative (such as a legal guardian, carer or family member)
 - provide information in an accessible format so that consent is informed
 - seek consent by asking an individual to 'opt in', in language that is concise, in plain English and user-friendly and in a way that is obvious, prominent and not bundled with other terms and conditions
 - outline the reasons why personal information is being sought and if personal information is being used for a secondary purpose
 - outline how information will be used and by whom
 - record the outcome of an individual's consent or otherwise against each request
 - limit the collection, storage, use and disclosure to instances where the information is directly relevant to the purpose of the collection and reasonably necessary to carry out functions and/or activities.
28. Any tick boxes or other consent mechanisms the Society uses to capture consent will be integrated with appropriate record-keeping systems so that evidence of consent records is retained. The record will include:
 - who consented
 - when they consented
 - how they consented
 - what they were told about the processing
 - whether they subsequently withdrew consent.
29. An individual may withdraw consent for the Society to collect personal information or use and disclose personal information for a secondary purpose by using the 'opt out' option. The 'opt out' option will be:
 - concise, easy to understand and user-friendly

- specific, obvious and prominent and not bundled with other terms and conditions
 - accessible through an unsubscribe button on email/text communications or by contacting the Association by phone, email or mail (with requests actioned in around 3-7 business days).
30. Where an individual has 'opted out', the Society will not store personal information in systems or send unsolicited communications.
31. The Society will advise an individual where it is required, by law, to collect personal information.

3.5 How the Society Uses or Discloses Personal Information

32. The Society may use and disclose personal information for primary purposes.
33. These primary purposes include (but are not limited to):
- assess applications for support or assistance
 - provide support and assistance to those in need
 - provide, administer, improve and personalise services and goods
 - administer, improve and personalise programs
 - process monetary donations and payments
 - assess employee or volunteer applications
 - conduct surveys and research
 - protect lawful interests
 - respond to queries or concerns
 - engage in direct-marketing activities including the promotion of services and fundraising activities.
34. The Society will not use or disclose personal information for any reason other than the primary purpose unless an exception applies. Exceptions include:
- an individual has consented to their personal information being used for a secondary purpose
 - it is necessary for lawful enforcement-related activities being carried out by, or on behalf, of an enforcement body
 - it is required or authorised under an Australian law, court or tribunal.
 - the use or disclosure is otherwise permitted by the Privacy Act or an applicable State or Territory law.
35. The secondary purposes for which the Society uses and may disclose personal information can include sharing with St Vincent de Paul Society entities located in other Australian states and territories.
36. The Society may disclose an individual's personal information under the following circumstances:
- with other non-for-profit organisations and other service providers where the purpose of disclosure is related, or in the case of personal information directly related, to the original purpose the information was collected for

-
- sharing with other third parties, including service providers and government agencies, that assist with archival, auditing, accounting, legal, business, banking, payment, delivery, data processing, storage and analysis, research, investigation, website or technology services
 - lawful requests from Courts, an enforcement body, a Court or Tribunal Order, government agencies and lawyers or in connection with suspected fraud, misconduct or unlawful activity.
37. Where the Society collects personal information for a primary purpose, this information may be used or disclosed within the Society or to third parties including:
- St Vincent de Paul Society entities located in other Australian states and territories
 - contractors engaged by the Society
 - service providers, including those to whom an individual may be referred to for assistance
 - government agencies
 - agencies engaged in regulation, auditing, accounting, legal, business, banking and payments
 - agencies engaged in data processing, storage and analysis, research, investigation, website or technology services
 - suppliers
 - other like-minded charities where this is considered reasonably necessary to carry out work.
38. In order to provide an individual with a service, the Society may disclose their personal information to:
- health and allied health professionals
 - employees, contractors, volunteers, suppliers or service providers for the purpose of providing the service
 - government and non-government agencies in partnership with the Society for the delivery of services
 - an authorised representative or other person whom has received an individual's consent
 - external professionals or organisations where an employee of the Society is subject to external or professional supervision or peer review
 - other charities registered with the ACNC where considered reasonably necessary to carry out work (for example, during a national natural disaster).
39. The Society may use, and is obliged to disclose, the personal information held in connection with lawful requests from Courts, an enforcement body, a Court or Tribunal Order, government agencies and lawyers or in connection with suspected fraud, misconduct or unlawful activity.
40. As the Society is an international organisation, it works closely with overseas partners of the International Confederation of the Society of St Vincent de Paul. The Society will take reasonable steps to ensure that disclosure of information to third parties overseas complies with Australian privacy laws.

3.6 How the Society Holds and Secures Personal Information

41. The Society directly handles personal information electronically and in hard copy form, with data secured either at its Tasmanian premises or remotely.
42. The Society may contract third parties to conduct its primary purpose and in doing so, they may collect personal information through software or external software and save personal information at physical premises or off site. In all instances, a range of measures are implemented to protect the security of that personal information. The Society takes reasonable steps to destroy or de-identify personal information where it is no longer needed for a permitted purpose.
43. Measures include retaining electronic records in a database that requires a two-factor authentication process to logon. Hard copies of personal information are stored securely.

3.7 Data breach notification

44. Where a data breach occurs when personal information is accessed, disclosed without authorisation or is lost, the Society will notify affected individuals and the Office of the Australian Information Commissioner when a data breach involving personal information is likely to result in serious harm in accordance with the Privacy Act.

3.8 The Society's Website

45. The way the Society's website is designed means that when interacting with the Society, website users will be interacting with the National Council as well as the Society in the state or territory in which they reside.
46. When navigating the Society's website, users enter through a shared webpage where there is information common to the Society in Australia. Users may then seek specific locationally relevant information about the Society by navigating to the website of the selected state or territory.

3.9 Donating Moneys on the Society's Website

3.9.1.1 Donations made to National Council

47. When making a monetary donation to the National Council, for example for a national natural disaster or the Society's initiatives under the Overseas Development Program, the personal information entered on the website is stored by the Society and managed in accordance with this Privacy Policy. Individuals who make a monetary donation to National Council will receive a tax-deductable receipt for any donation above AUD \$2.00.

3.9.1.2 Donations made to the Society at the State Level

48. The Society's website uses geographical directing when website users wish to make a monetary donation. When people donate money to the Society, they are directed to the various web-

based donation platforms that are offered by the Society. When donating money to the Society in Tasmania, the personal information entered on the website is stored by the Society in accordance with its relevant Privacy Policy.

49. An exception to this approach occurs when a donor specifies they wish to donate to a specific cause outside the state or territory in which they reside. This can be done by navigating from the shared website to the desired fundraising page operated by a state or territory.

3.10 Capture, Storage and Publication of Photographs, Videos and Interviews for use on the Society's Website, Social Media Platforms and Other Publications

50. The Society is responsible for managing the Society's website, social media platforms and publications. The website, social media platforms and publications often contain images, videos, interviews and stories of individuals who have been supported by the Society, to promote the Society's work including fundraising and public awareness campaigns.
51. The Society will seek consent from individuals, or where appropriate their legal guardian, before taking photographs, videos or conducting interviews. Consent will be gained by using the consent form available at **Attachment 1**.
52. The Society will clearly outline the intended use of the images, videos, and interviews. All images, videos, interviews and appropriate consent are stored securely in accordance with this Privacy Policy. Individuals can revoke their consent at any time, by using the contact details below.
53. In accordance with National Council's Safeguarding of Children and Adults at Risk Policy, images, videos and interviews of children and adults at risk are generally captured in a way to avoid the possibility of identifying the subjects, or this is achieved through post-production processes. Similarly, written stories focused on these subjects generally do not provide information, such as names or locations, that could be used to identify the individuals involved.
54. Where a person has agreed to their identity being used in advocacy or other initiatives of the Society, this agreement is explicitly documented, in accordance with the above policy.
55. The Society engages with partner organisations to promote the work of the Society and its mission. Where images and videos are included in this work, the Society will ensure that the above-noted consent is in place.

3.11 How the Society Treats Information Disclosed Through the Society's Website

3.11.1.1 Websites

56. When an individual visits the Society's website to read, browse and download information, systems may record information such as browser type, operating system, the date and time the websites were visited, the pages accessed, and any information downloaded.
57. This information is used by the Society or third parties to analyse how people who visit the website navigate these sites when they are seeking information. The Society analyses these

navigations to refine and improve offerings so that website users find the information they are seeking efficiently. Some of the third parties used (e.g. Facebook and Google Analytics) are likely to have access to an individual IP address.

3.11.1.2 Subscriptions and Monetary Donations

58. When an individual visits the Society's website to make a monetary donation or subscribe to information, the website will seek contact and payment information (in the case of making a monetary donation only). This information is stored securely using the website's systems.

3.11.1.3 Cookies

59. Like many other websites, the Society's website 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 the first time that a computer visits a website that operates cookies.
60. Individuals can configure their web browsing software to reject cookies; however, this may limit functionality or prevent them from accessing some parts of the website.

3.11.1.4 Google Analytics

61. The Society uses Google Analytics to inform and optimise the information placed on the Society's website, based on past visits to the website.
62. Google Analytics provides insights on how visitors use the website based on their browsing habits, so the Society can improve the website to make it easier to find information. Google also receives this information as website users browse the Society's website and other websites on the Google Display Network using Remarketing. This allows Google to use behavioural targeting of individuals based on their browser history.
63. If an individual would like to opt-out of customised Google Display Network services and Google Analytics for Display Advertising, browser settings should be updated. The use of the Google Analytics Opt-out Browser Add-on ensures a website user is not tracked into Google Analytics.

3.11.1.5 Third party websites

64. When an individual visits non-Society third party websites from a link on the Society's website, they exit the Society's website.
65. The website may contain links to other websites (including websites administered by a State and or a Territory Council of the Society in Australia and the Society's International General Council) that are not administered by the Society. All St Vincent de Paul Society entities located in other Australian states and territories are bound by the Privacy Act (Cth) and by the APPs.

4 How Individuals Can Request Access to, Or Amendment of Personal Information Held by the Society

66. An individual may formally request access to their personal information held by the Society at any time.
67. If an individual has any queries or concerns about the personal information that may be stored or they wish to access or correct any of the personal information that may be held about them, they can make a request using the details below.
68. The Society will always need to verify an individual's identity before a response can be prepared.
69. When making an access or correction request, individuals are asked to provide details of the particular information being sought, this assists in locating the information.

5 Privacy Complaints

70. The Society will deal with complaints relating to privacy issues in accordance with Society's Complaints Management Policy
71. The Society takes privacy concerns very seriously. Where an individual expresses any concerns that Society has interfered with their privacy, the Society will respond to let them know who will be handling their complaint and when they can expect a further response (generally within 30 days after a complaint has been received and acknowledged).

Contact: Privacy Officer
Email: admin@vinniestas.org.au
Post: 191 Invermay Road, Invermay, TAS 7248
Domestic: (03) 6333 0822
International: +61 3 633 0822

72. For information about privacy generally, or if an individual has any concerns about how the Society has resolved a complaint regarding their personal information to their satisfaction, individuals can contact the Office of the Australian Information Commissioner:

Website: www.oaic.gov.au
Post: GPO Box 5218, Sydney NSW 2001
Email: enquiries@oaic.gov.au
Privacy Hotline: 1300 363 992.

6 Publication of this Privacy Policy

73. The Society will publish and update this Policy on its website (www.vinnietas.org.au) and will make available a copy of the policy on request.

7 Related Policies

- Complaints Management Policy
- Safeguarding of Children and Adults at Risk Policy

Appendix A Authorisations

Document Name:

Privacy Policy

Prepared by: Les Baxter
Chief Operating Officer

Signature:



Date:

29/03/2023

Approved by: Heather Kent
Chief Executive Officer

Signature:



Date:

29/03/2023

Authorised by: Corey McGrath
President, St Vincent de Paul Society (Tasmania) Inc

Signature:



Date:

29/03/2023

Appendix B Preparation of Policy Document

Change History

Version	Date	Revision Description	Author
1.00	January 2023	Version 1.0	Les Baxter

Review History

Version	Scheduled Review Date	Review Date	CEO	President State Council

Attachment 1

CONSENT FORM FOR USE OF INTERVIEWS, PHOTOGRAPHS AND VIDEO

7.1.2 BACKGROUND

The St Vincent de Paul Society (Tasmania) Inc. (The Society) and in conjunction with others, produces publications and administers public awareness campaigns to:

- increase public and stakeholder awareness of our mission, programs and services
- advocate for outcomes associated with our mission.

For the above purposes, the Society produces and distributes a range of promotional materials, including:

- external and internal publications, such as updates, newsletters and magazines
- corporate publications, such as annual reports and fact sheets
- online publications, such as websites and social media presences
- television, print, radio and online media segments or advertisements.

The Society's privacy policy is available at www.vinniestas.org.au/privacy and contains information about how to access and correct personal information and how you may complain about a breach of your privacy.

The copyright in images used for these purposes, rests with the Society.

7.1.3 CONSENT

I give permission for images in which I/my child/the children of whom I act as the guardian appear and are used by the Society for public relations purposes.

In particular, I note that this may include images or video being used in the above print and electronic publications.

I give permission for video interviews to be transcribed and used in print and electronic publications noted above.

I understand that the Society will not be accountable should overseas recipients of these images breach Australian privacy laws and that I will not be able to seek redress under the Australian Privacy Act.

I have read and understand this notice, and consent to the collection, use and disclosure of my image, including disclosure to overseas recipients, as outlined above.

I understand this consent is valid in perpetuity. I acknowledge I am able to revoke my consent by contacting media@svdp.org.au.

I acknowledge that Society may continue to hold my/our images after this date and may use them for archival or documentary purposes after this consent has expired.

Signed _____

Dated _____

SHOOT INFORMATION

SHOOT

Date _____

Image Details _____

PHOTOGRAPHER

Name _____

Number _____

Email _____

Signature _____

APPROVALS

Name of Subject(s)/Parent(s)/Guardian(s)
