

# Privacy Policy

<b>Section</b>	Public Engagement
<b>Policy Number</b>	4.2
<b>Owner</b>	Privacy Officer
<b>Approver</b>	Jesuit Mission Australia Board
<b>Last Endorsed</b>	2024
<b>Next Review</b>	2026
<b>Version</b>	2.0

## 1. INTRODUCTION

This privacy policy explains how Jesuit Mission Australia Limited, ABN 62 639 931 230 (JMA) handles and manages the personal information provided to us.

## 2. SCOPE

This privacy policy applies to all JMA employees, board, volunteers, consultants, contractors and partners.

## 3. DEFINITIONS

In this document:

- **APPs** mean the Australian Privacy Principles.
- **Opt-in** means an individual provides consent for JMA to send selected communications and marketing materials.
- **Opt-out** means that an individual does not provide consent for JMA to send selected communications and marketing material.
- **Personal information** as set out in the *Privacy Act 1988 (Cth)* means information or an opinion, whether true or not, about an identified individual or a reasonably identifiable individual. It includes an individual's name, signature, address, phone number, date of birth, sensitive information, employee record information, photographs, internet protocol (IP) addresses, voice print and facial recognition biometrics and location information from a mobile phone.
- **Primary purpose** means the purpose for which the information was originally collected.
- **Privacy Act means the Privacy Act 1988 (Cth).**
- **Secondary purpose** means the use or disclosure of information for another purpose separate from the primary purpose.
- **Sensitive information** as set out in the *Privacy Act 1988 (Cth)* means specific types of personal information that include information or an opinion about an individual's racial or ethnic origin,

political opinions, or associations, religious or philosophical beliefs, trade union membership or associations, sexual orientation or practices, criminal record, health or genetic information and some aspects of biometric information.

#### **4. PRIVACY COMMITMENT STATEMENT**

JMA is committed to protecting privacy and complying with the *Privacy Act 1988 (Cth)*, including the Australian Privacy Principles (APPs), and other relevant laws and regulations about managing personal and sensitive information. This Privacy Policy outlines how we collect, use, disclose, secure, and dispose of personal information.

#### **5. USE OF PERSONAL INFORMATION**

JMA only collects, uses, stores, and discloses personal information for:

- a) Purposes directly related to the primary purpose for which it was collected
- b) Secondary purposes for which consent has been provided, or where you would reasonably expect us to use or disclose your information for that purpose, and where that purpose is related to the primary purpose of collection
- c) As otherwise permitted or required by Australian law.

Some specific purposes for which JMA collects, uses, and discloses personal information are:

- to provide, administer, improve, and personalise JMA's programs, projects, fundraising and engagement activities
- administration of JMA's Customer Relationship Management (CRM) system
- to seek and accept donations and payments
- to keep records and contact details up to date
- to respond to queries, feedback, and complaints
- for marketing to promote JMA's programs, projects, fundraising and engagement activities
- for direct marketing to individuals who have 'opted-in' to personal information being used for this purpose
- to conduct surveys, research, analysis, and advocacy work
- to operate, develop, and improve JMA's website, social media sites and digital platforms
- to protect and improve the security and effective functioning of our sites and information technology systems
- to meet funding, professional, and legal obligations in the provision and reporting of programs, projects, and fundraising activities
- to manage JMA's day-to-day business and commercial relationships
- to enable suppliers and service providers to perform functions on JMA's behalf

- to comply with industrial relations, human resources and workplace health and safety obligations
- to manage employee applications (including volunteer applications)
- to pay invoices and make payments
- to comply with tax reporting obligations
- to comply with any legal and regulatory obligations, and
- to establish or protect JMA's legal rights, property, or safety.

## 6. DISCLOSURE

JMA is required to disclose personal information about an individual under the following circumstances:

- If required by Australian law; or
- In connection with any subpoena, court order or other legal process, to comply with a request from Australian regulators or Australian government agencies or any other legally enforceable demand.

Staff who receive a request for personal information should contact JMA's Privacy Officer. When personal information is disclosed as required by law, or in connection with lawful requests a note of the disclosure will be recorded in JMA's records.

In an emergency JMA may disclose an individual's personal information without their consent where disclosure is necessary to:

- prevent a serious and imminent threat to any person's health or safety
- find a missing person.

## 7. TYPES OF PERSONAL INFORMATION JMA COLLECTS

JMA may typically collect and store:

- name and contact details (telephone number, email, and postal address)
- history of donations, correspondence, and other interactions with JMA
- credit card (see section 13 for management details) or bank account details
- age and/or DOB
- employer/job title
- images (photographs and or other recordings where a person's identity is clear or can be ascertained) taken at JMA functions, events or programs
- bequests and related information.

JMA may collect personal information about staff and personnel (including employees, contract staff, volunteers, and board members):

- Name and contact details
- CV details (including qualifications, education history, previous work history) and feedback from supervisors and referees
- date of birth; next of kin/emergency contact details; psychometric testing, pay rate and salary, bank details, training records
- details of whether the staff member has a current working with children check and the results of any police/criminal history checks
- details about the staff member's marital status, religious beliefs, religious affiliations, and philosophical beliefs they elect to disclose to us directly, or which are provided to us (where permitted by law) in connection with the services we perform for any of our related bodies corporate
- information regarding the performance and conduct of the staff member
- training and participation information
- CCTV footage and images of the staff member taken at our or the related body corporate's premises or events
- details of emails, calls and correspondence that the staff member has sent or received
- details of complaints made against or by the staff member
- health information and other sensitive information (for example, details of a disability or health condition a staff member/ personnel elect to disclose to us directly, in connection with insurance claims or dispute resolution, or which is provided to us (where permitted by law) in connection with the services we perform for our related bodies).

## **8. ANONYMITY AND PSEUDONYMITY**

Individuals have the option of not identifying themselves, or using a pseudonym when dealing with JMA concerning a particular matter except where:

- JMA is required or authorised by Australian law, or a court/tribunal order, to deal with individuals who have identified themselves; or
- it is impractical for JMA to deal with individuals who have not identified themselves or use a pseudonym.

## **9. HOW JMA COLLECTS PERSONAL INFORMATION**

JMA collects personal information directly and indirectly. Where it is practical to do so, JMA will collect personal information directly from an individual. In some circumstances, JMA may also collect personal information from other organisations and entities the organisation deals with.

JMA only collects personal information using fair and lawful means.

### **9A. DIRECT SOURCES OF INFORMATION**

Personal information may be collected and stored when an individual:

- contacts JMA via telephone or by any other means (including face-to-face, written correspondence, email, our website and social media)
- subscribes to JMA newsletters
- receives or engages with JMA eNewsletters
- visits, engages with, donates or buys from JMA's websites and/or social media channels
- donates to JMA
- makes a bequest to JMA
- registers for a JMA function or event
- participates in a JMA raffle
- participates in a JMA charity auction
- participates in a JMA project in Australia or overseas
- applies for a role or position with JMA (as an employee, contractor, director or volunteer)
- provides goods and services to JMA, or
- enters a contract or subcontract with JMA.

## **9B. INDIRECT SOURCES OF INFORMATION**

In some circumstances, JMA may collect personal information from publicly available sources and other organisations and entities JMA deals with.

JMA will only collect personal information from third parties if:

- the third party is permitted and or required by law to disclose such information; or
- an individual has consented to those parties disclosing such information to us.

In circumstances where an individual may not be aware that JMA has collected personal information or the personal information is collected from someone other than the individual or their legal representative, parent/legal guardian, JMA will take reasonable steps to notify the individual, or otherwise ensure that the individual is aware that JMA has collected the information and the circumstances of collection.

If JMA receives unsolicited personal information, JMA will decide within a reasonable period whether it could be collected according to the APPs. If JMA decides the information should not be collected, the information will be destroyed or de-identified as soon as practicable.

## **10. INFORMATION COLLECTED FROM OUR WEBSITES AND DIGITAL CHANNELS**

JMA may collect personal information when individuals use JMA's websites, social media pages and digital channels.

## 11. THIRD-PARTY WEBSITES AND CHANNELS

Some third-party communication channels and service providers may capture and store personal information overseas when providing support or other services to JMA. For example:

- Web traffic and activity are disclosed to Google when you visit our websites and mobile applications. Google stores information across multiple countries.
- When you communicate or engage with us through a social network service such as Facebook, Twitter or LinkedIn - the social network provider and its partners may collect and hold your personal information overseas across multiple countries.
- To reduce spam and protect against fraud, JMA's website uses reCAPTCHA to protect online submission forms. reCAPTCHA is owned by Google. Please see Google's Privacy Policy for information about how Google collects and uses website visitors' personal information.

You can find out more about opting out of Meta, Google and LinkedIn analytics by visiting:

- <https://help.instagram.com/>
- <https://www.facebook.com/help>
- <https://policies.google.com/technologies/ads>
- <https://www.linkedin.com/help/linkedin>

JMA's website may contain links to other websites operated by third parties. When an individual visits a third-party website from a link on JMA's website, they exit JMA's website. JMA makes no representations or warranties about any third-party website. JMA is not responsible for third-party website content and is not responsible for the privacy policies of any third-party website.

## 12. WHEN AND HOW JMA MANAGE CONSENT

By visiting JMA websites, donating or making a purchase, requesting marketing material/s, signing up for our newsletters, signing a petition, applying for employment, registering to attend an event, completing a survey or otherwise providing us with personal information, an individual acknowledges that their personal information is being collected and used by JMA for the primary and secondary purposes outlined in Section 5 of this Policy. At the point of information capture, or as soon as possible following the collection, JMA will:

- provide a clear and transparent Data Collection and Consent Statement
- provide a link to JMA's Privacy Policy, including instructions on how to 'opt-out', request changes to information, or make a complaint.

An individual may opt-out of receiving communication at any time, notifying JMA by phone, email, or mail. An unsubscribe button is also provided on all batch-sent and/or automated JMA email and text communications. By electing not to opt-out, JMA assumes we retain consent for the individual to receive similar communications in the future.

JMA always aims to provide supporters with a positive experience, excellent supporter care and inspiring communications. We endeavour to record and manage specific supporter communications preferences which allow for opting in or out of specific communications and/or channels.

JMA will not send unsolicited communications after an individual has opted-out.

An individual has the right to request that JMA delete the personal information used by JMA.

JMA will not store personal information after an individual withdraws consent unless required by law.

### **13. SECURITY OF PERSONAL INFORMATION**

JMA takes all reasonable steps to protect the personal information it holds from misuse, interference, and loss, as well as unauthorised access, modification, or disclosure.

Electronic information is stored on secure servers that are protected in controlled facilities. Access to digitally stored personal data is password protected and requires multi-factor identification by all users who have permission to access the data. Hard copy information is generally stored in JMA's offices, which are secure to prevent entry by unauthorised people.

JMA uses a third-party financial institution to process credit card transactions. It receives the credit card number and other personal information of donors, only to verify credit card numbers and to process credit card transactions in a secure environment. Where financial information is stored on our servers, information is encrypted, and access is restricted to authorised staff only. Where credit card information is received in hardcopy donation forms, JMA has strict internal handling controls, and as soon as the donation is processed all credit card information is redacted.

Where JMA no longer needs personal information for any purpose for which the information may be used or disclosed under the APPs, JMA will take reasonable steps to destroy the information or ensure that it is de-identified.

JMA requires providers, suppliers and other third parties to provide reasonable security for personal information. JMA will also ensure that data transferred to third parties to assist with core business (such as a mailing house) is shared safely and securely.

### **14. DATA BREACH NOTIFICATION**

JMA's *Data Breach Policy* describes how JMA will respond to a breach of JMA-held data and when to report an eligible data breach to the Office of the Australian Information Commission as required under the Notifiable Data Breach (NDB) scheme and *Privacy Act 1988 (Cth)*.

### **15. JMA EMPLOYEES**

We collect information about employees (including prospective employees) either directly from the employees (such as during the application process and the course of their employment) or in some cases from third parties such as recruitment agencies, referees, and supervisors. We also may collect personal information from our related organisations. See section 7 for further details of the information we typically collect about employees and prospective employees.

Under the Privacy Act, personal information about a current or former employee may be held, used, or disclosed in any way that is directly connected to the employment contract and relationship. In addition, JMA will handle employee records in accordance with legal requirements and our applicable policies in force from time to time and may rely on any exceptions in the Privacy Act (including the employee records exemption) that may apply.

### **16. RIGHT TO ACCESS, UPDATE or CORRECT YOUR PERSONAL INFORMATION**

Individuals have the right to request access, correct or obtain a copy of their personal information held by JMA at any time. Requests should be addressed to the Privacy Officer as detailed below.

JMA will verify an individual's identity before the request can be actioned.

## 17. PRIVACY COMPLAINTS

If you have any questions about this Privacy Policy or wish to make a complaint about how JMA handles your personal information (including any alleged breach of the Privacy Act or the Australian Privacy Principles under that Act), please contact our Privacy Officer as detailed below.

We take all complaints seriously and will respond to your complaint within a reasonable period. We request that you cooperate with us during this process and provide us with any relevant information that we may need.

If you are dissatisfied with the handling of your complaint, you may contact the Office of the Australian Information Commissioner:

Office of the Australian Information Commissioner  
GPO Box 5288, Sydney NSW 2001  
Telephone: 1300 363 992

## 18. CONTACT DETAILS

The contact details of our Privacy Officer are as follows:

Postal Address: P. O Box 193, North Sydney NSW 2059  
Phone: 02 8918 4109  
Email: [support@jesuitmission.org.au](mailto:support@jesuitmission.org.au)  
Privacy Officer: Angela Ford

## 19. PUBLICATION

JMA will publish this policy on its website [www.jesuitmission.org.au](http://www.jesuitmission.org.au) and ensure it is accessible through key communication and data capture channels.

## 20. CHANGES

JMA reserves the right to change the terms of this Privacy Policy from time to time. An up-to-date copy of JMA's Privacy Policy is available on the website.

## 21. STAFF TRAINING AND AWARENESS

All employees shall receive comprehensive training on the privacy policy's principles and procedures. This will include training on the importance of maintaining confidentiality and reinforcing the organisational commitment to protecting personal data and ensuring regulatory adherence.

## 22. RELATED DOCUMENTS

Title	Documents Type
JMA Data Breach Policy	JMA Policy
JMA Complaints Policy	JMA Policy
Code of Conduct	Province Wide Policy
JMA Safeguarding	JMA Policy

### 23. RELATED LEGISLATION AND/OR STANDARDS

<b>Title</b>	<b>Documents Type</b>
Privacy Act 1988 including the Australian Privacy Principles	Legislation
Information Privacy Act 2022	Legislation
Freedom of Information Act 1982	Legislation
Fair Work Act	Legislation
Fundraising Institute Australia	Fundraising Code

### 23. VERSION CONTROL AND CHANGE HISTORY

<b>Version</b>	<b>Approved Date</b>	<b>Approved By</b>	<b>Next Review Date</b>	<b>Summary of Changes</b>
2.0	July 2024	JMA Board	2026	Policy Re-Write