

Privacy Policy

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Drafted by:	Ms Laura Stirling	Approved by Board on:	23 June 2020
Responsible person:	Managing Director	Scheduled review date	23 June 2022

1. Introduction

Educating the Future Australia Limited (ETF) is committed to protecting and securing the privacy and confidentiality of the personal information of ETF's directors, volunteers, donors, partners and any third party body, both in Australia and overseas, in accordance with this Policy and the Australian Privacy Principles.

This Policy will be made available to the public via means including the website and on request.

1. Purpose

This Policy is designed to assist all donors and third parties to understand how and why ETF collects, stores and uses personal information, as well providing an avenue for complaints or enquiry. The information ETF collects can be changed or accessed at any time.

2. Scope of Policy

This policy applies to all ETF directors and volunteers.

3. Definitions

Term	Definition
Donor	A person who has donated to ETF, in the form of money or materials. Also a person who requests be included on ETF's donor database.

Personal Information	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.
Third Party	A person or group other than the principal people involved in ETF

4. Policy

4.1 Personal Information

Personal information collected by ETF **includes**:

- Name
- Contact details (address, phone, fax, email)
- Donation history (amount, date, platform)
- Information from conversations (via phone, post or email) with ETF representatives

4.2 How we collect personal information

In most cases, ETF collects personal information directly from the person, via email, phone or via the website, when donating to or, in some circumstances, corresponding with ETF.

However, information **is** collected automatically (such as online activity by visitors to ETF's website) or from another source (such as information that is listed in public directories, or obtaining details for potential future supporters from like-minded organisations or third-party suppliers).

Personal information is stored both in ETF's own computer devices and filing systems, but also using Google applications (Drive and G-Suite such as Documents and Sheets).

4.3 Online Activity

ETF utilises Google Analytics to track visits to the ETF website, and uses this information to track the effectiveness of the website. While this data is mostly anonymous, sometimes it can be connected to you, for instance in personalising a webpage, or prefilling a form with your details. For more information on ETF's analytics tools, read Google's Privacy Policy.

4.4 How we use personal information

In order to raise awareness, fundraise and engage with the public, ETF collects personal information. ETF will typically use such information to:

1. Process donations;
2. Send receipts to the donor;
3. Email ETF related information, updates and opportunities;
4. Respond to any questions, comments, queries or concerns;
5. Request feedback to improve our services and processes;
6. Update your history of engagement and support of ETF; and
7. Analyse donor activity.

Donors can elect not to receive further correspondence from ETF by advising in writing (including email) or by phone.

4.5 Disclosure to an External Party

ETF will not disclose information about the donor or third party without the donor or third party's prior consent. This includes disclosure to any other organisation, apart from outsourced providers such as:

- mail delivery and sorting (including electronic);
- information storage;
- website usage analysis;
- legal, audit or accounting.

ETF takes reasonable steps to make sure that our agreements with service providers include appropriate privacy and confidentiality obligations.

ETF can ask donors for permission to share details of their donation with project partners. Where consent is given, ETF can advise project partners of details of the donation, including first name and surname of donor, the amount of the donation received and a method of contacting the donor (phone number, postal address or email address). No other information will be shared with the partner organisation.

ETF will only ever share details of a donation with the partner with respect to whom the donation was made. Donations made in respect of other projects will not be shared with the partner. The information is provided solely for the purpose of thanking the donor, updating them with information about the specific project, and for reconciling records in respect of donations expected/pledged and received.

When donors give their consent (by checking the consent box on an electronic or paper donation form) this consent is recorded in our database. If donors wish to revoke their consent they can do so at any time by contacting the ETF team via the website or email.

ETF **can, at its own discretion**, share non-personal, de-identified and aggregated information.

4.6 Donor's Use of Others' Personal Information

In line with ETF's commitment to value people and our obligations under the ACFID Code of Conduct, we expect donors to adhere to the Code of Conduct requirement to "act in ways that respect the dignity, uniqueness and intrinsic worth of every person", as well as to uphold ETF's values, with respect to information related to any ETF affiliate.

4.7 Securing and Maintaining Information

ETF will take all reasonable steps to keep donor's personal information secure (whether electronic or in hard copy) and to keep this information accurate and up to date.

It is ETF's policy to:

- permanently de-identify personal information where reasonable and possible; and
- destroy personal information once there is no longer a legal or business need for ETF to retain it, or at donor or third party's request.

Unfortunately, no data transmission over the Internet can be guaranteed to be secure. While ETF strives to protect personal information, it cannot guarantee the security of any information received over the Internet. As such, provision of such information is done at your own risk. Once your transmission is received, ETF will take all reasonable steps to ensure its security and integrity.

4.8 Accessing Donor's Own Information

Donors can access their information at any time by making a request to an ETF Team Member. All requests for access to, or updates to, personal information should be made by email, post or phone to ETF.

Depending on the circumstances, ETF has the ability to deny this request, for example, where granting the donor access would violate another person's privacy.

When a request is made, the ETF Member will ask the donor to provide some form of identification (such as a driver's licence or passport) in order to confirm their identity.

4.9 Underage Information

ETF will collect information from children (anyone under the age of 18), where a child engages in ETF events and campaigns. Information collected includes personal information and parental consent forms. All underage information will not be disclosed elsewhere by ETF without prior parental guardian consent.

Underage personal information will be stored and secured in the same manner as other personal information. This includes storage on Google applications (Drive and G-Suite such as Documents and Sheets).

4.10 Complaints, Enquiries and Contact Methods

ETF strives for transparency in communication and the maintenance of privacy and security of donors' personal information. If you wish to make a complaint about a breach (or alleged breach) by ETF of this Policy or of the Australian Privacy Principles, you are able to contact ETF via the means listed below. This also relates to any concerns or enquiries.

ETF asks that any enquires or complaints are directed to: people@educatingthefuture.org

4.10 External Complaint Process

ETF is bound by the APP code. If you are unsatisfied with ETF's internal handling of your complaint, you are able to take the complaint to a recognised external dispute resolution scheme (if applicable). If you are unsatisfied with this procedure, you may then take the complaint to the OAIC. Further information on this complaint resolution process can be found on the OAIC website below:

<https://www.oaic.gov.au/privacy/privacy-complaints/how-we-investigate-and-resolve-your-complaint/>

5. Policy Review

In order to ensure that this policy continues to be effective and applicable, the procedure will be reviewed on a biennial basis. Conditions which might warrant a review of the procedure on a more frequent basis would include:

- Board of Director concern
- Changes to legislation (including the Australian Privacy Principles)
- Changes to ACFID/AusAID requirements

Following the completion of any review, the policy will be revised and/or updated to correct any deficiencies, if required and approved by the ETF Board. Any changes to the policy will be communicated to team members and partners.