



# Privacy Policy

POL-0001

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## Purpose

**UCAQ** (also called **we** or **us**) means the functions and activities of the Uniting Church in Australia —

- within and in relation to the bounds of the Queensland Synod; and
- outside the bounds of the Queensland Synod (where managed by parts of the organisation located within the bounds of the Queensland Synod),

under the *Uniting Church in Australia Act 1977 (Qld)* which are numerous and varied.

Through its functions and activities, the UCAQ interacts with many individuals in many ways. The privacy of all individuals with whom the UCAQ interacts (**you**) is very important to us.

UCAQ is committed to protecting all Personal Information we collect and hold. We do this by handling Personal Information in accordance with the Australian Privacy Principles in the Privacy Act 1988 (Cth) (**Privacy Act**).

## Scope

This policy applies to:

- all functions and activities of the Uniting Church in Australia which occur within or in relation to functions and activities within the bounds of the Queensland Synod;
- all functions and activities of the Uniting Church in Australia which occur outside the bounds of the Queensland Synod which are managed by parts of the organisation located within the bounds of the Queensland Synod; and
- all Personal Information (including sensitive information) of all individuals with whom the UCAQ interacts.

This policy applies in addition to any other privacy policy and processes which may be adopted by any part of the UCAQ in relation to that part's specific functions or activities. In the event of an inconsistency between this policy and any other privacy policy or process, this policy prevails.

This policy does not apply:

- to Personal Information collected by UCAQ that is exempted under the *Privacy Act 1988 (Privacy Act)*;
- if the UCAQ is required or authorised by an Australian law or a court/tribunal to collect or use or disclose Personal Information; or
- to any functions or activities of the Uniting Church in Australia which are not within or in relation to functions or activities within the bounds of the Queensland Synod.



## Principles

### Personal Information we collect

- 1) The types of Personal Information we collect includes:
  - names, occupation, contact and address details;
  - date of birth and gender;
  - information in identification documents (for example, passport, driver's license, blue card, yellow card, companion card, marriage celebrant registrations, Australian tax office registrations and other government issued identification);
  - bank account details, shareholdings and details of investments;
  - tax file number;
  - details of superannuation and insurance arrangements;
  - educational qualifications and courses, employment and volunteer details, history and entitlements;
  - visa or work permit status;
  - personal Information about your spouse and dependents;
  - details of any products, services, information or assistance you have obtained from us or which you have enquired about, together with any additional information necessary to deliver that product or those services, information or assistance or to respond to your enquiries;
  - other information you provide to us; and
  - commentary or opinion about you.

### Sensitive Information we collect

- 2) In order to provide specific products, services information or assistance or for other purposes, it may be necessary in some circumstances for UCAQ to collect sensitive information (which is a subset of Personal Information) about you. Examples of the type of sensitive information that may be collected in such circumstances include:
  - professional memberships;
  - racial or ethnic origin;
  - religious beliefs or affiliations, including worship details;
  - ministerial details, history and entitlements;
  - criminal history; and
  - health information.

### Exempt Personal Information

- 3) In very limited circumstances, the Privacy Act allows the UCAQ to deal with (collect, hold or disclose) your Personal Information other than in accordance with this policy. This is allowed where:
  - a) the Personal Information relates to the UCAQ's functions or activities and the information relates solely to a UCAQ member or an individual in regular contact with the UCAQ in connection with its functions or activities; or
  - b) UCAQ reasonably believes the Personal Information is:
    - necessary to lessen or prevent a serious threat to the life, health or safety of any individual, or to public health or safety;
    - necessary to take appropriate action in relation to suspected unlawful activity or serious misconduct;
    - reasonably necessary to assist in the location of a person who has been reported as missing;
    - reasonably necessary to establish, exercise or defend a legal or equitable claim; or
    - reasonably necessary for the purposes of a confidential alternative dispute resolution process.



## Collection, holding, use and disclosure of Personal Information

### Why we collect, hold, use and disclose Personal Information

- 4) We collect, hold and use Personal Information for a number of purposes including:
  - the furtherance of our mission;
  - to provide products, services, information or assistance requested by you;
  - to respond to requests or queries;
  - to maintain contact with you and other contacts;
  - to keep you and other contacts informed of our services, developments, information and opportunities;
  - to notify you of seminars and other events;
  - to provide you with and manage your access to protected areas of any UCAQ website or social media platform;
  - for administrative purposes;
  - to update our records and keep your contact details up to date;
  - to process and respond to any complaint made by you or against you;
  - for purposes relating to engagement of our employees, volunteers and placement of our Ministry Agents;
  - to manage any conflicts of interest;
  - to conduct surveys;
  - to allow you to interact with our websites or social media platforms;
  - for seeking your feedback;
  - to meet any regulatory obligations; and
  - for any other related purpose.
- 5) If you do not provide us with the Personal Information we have requested, we may not be able to provide you with the products, services, information or assistance you have asked us to provide and your experience of our websites or social media platforms may not be as enjoyable or useful.
- 6) We may disclose your Personal information to:
  - our employees, volunteers, Ministry Agents or contractors;
  - our third party service providers including web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors and research and marketing agencies and consultants;
  - professional advisors and experts such as accountants, solicitors and business advisors contracted as part of an engagement;
  - government or regulatory bodies; and
  - any organisation or person for any authorised purpose with your express consent.
- 7) Any part of the UCAQ may combine or share any information collected from you with information collected by any other part of the UCAQ.
- 8) We may send you direct marketing communications about our products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the Spam Act 2003 (Cth). At any time, you may opt-out of receiving direct marketing communications from us by contacting us or by using the opt-out facilities provided in the communications.
- 9) We do not disclose Personal Information to anyone otherwise than in accordance with this policy. However, we may share de-identified information for research or promotional purposes.



## How we collect Personal Information

- 10) Unless an exemption applies, we will only collect your sensitive information with your express consent and will only collect your Personal Information with your consent (which may be implied).
- 11) We collect your Personal Information directly from you unless it is unreasonable or impracticable to do so. When collecting Personal Information from you, we may collect in ways including directly or indirectly through our representatives, use of a UCAQ website, use of other UCAQ social media platforms, your completion of surveys or otherwise from time to time.
- 12) We may also collect Personal Information from third parties including credit reporting agencies, law enforcement agencies, social media platforms, other websites, other government entities, previous employers and other organisations within the broader Uniting Church in Australia such as other Synods, the Assembly and separately incorporated entities.
- 13) It is generally not practical to remain anonymous or to use a pseudonym when dealing with UCAQ as usually we need to know who you are to provide specific products, services, information or assistance to you.
- 14) Unless an exemption applies, if you provide us with Personal Information about someone else, you should only do so if you have their authority or consent to provide us with their Personal Information. You should also take reasonable steps to inform them of the matters set out in this privacy policy or any UCAQ privacy collection statement given to you.

## Cookies and IP addresses

- 15) When you access some UCAQ websites, we may use software embedded in our website (such as Javascript) and we may place small data files (or cookies) on your computer or other device to collect your Personal Information or information about which pages you view and how you reach them, what you do when you visit a page, the length of time you remain on the page, and how we perform in providing content to you. This enables us or our third party host or service provider to recognise your computer and greet you each time you visit without bothering you with a request to register. It may also enable us to keep track of products, services or information that you view to that, if you consent, we can send you news about those products, services or information. We may also use cookies to measure traffic patterns, to determine which areas of our websites or social media platforms have been visited and to measure transaction patterns in the aggregate. We use this to research our users' habits so that we can improve our products, services and information. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them.
- 16) We may gather your IP addresses (that is, the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track users' movement, and gather broad demographic information. This information does not identify you personally.

## Social media platforms

- 17) You may wish to participate in the various blogs, forums, wikis and other social media platforms hosted by UCAQ or on which UCAQ participates. One of the aims of these social media platforms is to facilitate and allow you to share content. However, UCAQ cannot be held responsible if you share Personal Information on these platforms that is subsequently used, misused or otherwise appropriated by another user.



### Links

- 18) Our websites and social media platforms may contain links to other websites and platforms operated by third parties over which UCAQ has no control. We make no representations or warranties in relation to the privacy practices of any third parties and we are not responsible for the privacy policies or content of any third party websites. Third parties are responsible for informing you about their own privacy practices.

### **Disclosure of Personal information to overseas recipients**

- 19) Some parts of the UCAQ use data hosting facilities and third party service providers to assist us with our functions and activities. As a result, your Personal Information may be transferred to, stored at, processed or backed-up at a destination outside Australia. These destinations outside Australia include, but are not limited to New Zealand, the United States of America, Singapore, Netherlands, Sweden, Ireland, France, Italy, Spain, Poland, India, Korea, Hong Kong, China, Taiwan, the Philippines, Japan, Canada, Brazil and the United Kingdom. We are not able to ensure these data hosting facilities and third party service providers will comply with Australian privacy laws, although they may have their own privacy laws.

### **Collection Statement**

- 20) When UCAQ collects Personal Information orally or in writing, a printed copy of the following statement must be given or this statement must be read out. Where the Personal Information is collected via e-mail, a link to this statement must be provided to the person from whom the information is collected.

#### ***Statement***

- 21) We collect your personal information to enable us to further our mission, respond to your request and maintain contact with you. We may also collect sensitive information about you. You give us your explicit informed consent to our exchanging your information with any part of the UCAQ, data hosting facilities and any third party service provider or professional advisor for these purposes, or purposes reasonably related to them and also for any other purpose you have consented to or as authorised by law. If you provide us with personal information about another person, please make sure that you tell that person about this privacy statement. Further information about what personal information and sensitive information is, as well as why and how we collect, hold, use and disclose it; and how you can access your personal information is available in our Privacy Policy which you can obtain from our website [www.ucaqld.com.au](http://www.ucaqld.com.au) or, in printed form, following your written or personal request.

### **Security**

- 22) We take reasonable steps to ensure your Personal Information is protected from misuse and loss from unauthorised access, modification or disclosure. We may hold your information in either electronic or hard copy form.
- 23) As our websites and social media platforms are linked to the internet, and the internet is inherently insecure, we cannot provide any assurance regarding the security of transmission of information you communicate to us online. We also cannot guarantee that the information you supply will not be intercepted while being transmitted over the internet. Accordingly, any Personal Information or other information which you transmit to us online is transmitted at your own risk.

#### 24) Data Breaches

In the event of a data breach or suspected data breach we shall assess the circumstances and evaluate if the breach is one which may pose a risk of serious harm to affected individuals. An investigation will follow



and, where serious harm to affected individuals is assessed as likely, notification made to both the Office of the Information Commission and to those individuals affected.

### How you can access your Personal Information and update it

- 25) You may request access to any Personal Information we hold about you at any time by contacting us. Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). We may charge you a fee to cover our administrative and other reasonable costs in providing the information to you. We will not charge for simply making the request and will not charge for making any corrections to your Personal Information.
- 26) There may be instance where we cannot grant you access to the Personal Information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others, would result in a breach of confidentiality, is contrary to natural justice or is prohibited by law. If that happens we will tell you.
- 27) If you believe that Personal Information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it. We will consider if the information requires amendment. If we do not agree that there are grounds for amendment then we will add a note to the Personal Information stating that you disagree with it.

### Complaints

- 28) If you have any complaints regarding an interference with your privacy, you may contact the General Secretary:
- by email on [complaints@ucaqld.com.au](mailto:complaints@ucaqld.com.au);
  - by phone on 07 3377 9702; or
  - by mail addressed as "Confidential" to the General Secretary, Uniting Church Queensland Synod, GPO Box 674 Brisbane QLD 4001
- 29) We will treat your complaint confidentially and a representative will contact you after its receipt to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in a timely and appropriate manner. If you are not satisfied with our response, you can refer your complaint to the Office of the Australian Information Commissioner.

### Related documents

- Privacy Act 1988 (Cth), including the Australian Privacy Principles (<https://www.legislation.gov.au/Details/C2007C00615>)
- UCAQ Collection Statement Tool
- UCAQ Data Breach Process

### Definitions

The terms used in this policy have the same meanings as defined in the Privacy Act (<https://www.legislation.gov.au/Details/C2007C00615>).

Ministry Agents are those persons engaged in ministry placement and other religious activities of the Uniting Church in Australia within the bounds of the Queensland Synod.



## Revisions

Document number		POL-0001			
Version	Approval date	Approved by	Effective date	Policy owner	Policy contact
2.0	06/09/2018	Synod Standing Committee (#18.197)	11/09/2018	Executive Director Risk	Manager Risk and Compliance
Next scheduled review		11.09.2021			