

# Privacy

POLICY NAME	PRIVACY
REFERENCE NUMBER	7-SI-PO-2
POLICY OWNER	CEO
POLICY APPROVER	SYMBIOSIS INTERNATIONAL BOARD
RESPONSIBLE COMMITTEE	FINANCE AND RISK COMMITTEE
RELATED POLICIES	COMMUNICATIONS POLICY TRANSPARENCY POLICY
RELATED DOCUMENTS	N/A
ACFID CODE REFERENCE	7.2.2
APPROVAL DATE	13 APRIL 2019
REVIEW DATE	28 FEBRUARY 2023

## 1 PURPOSE

The purpose of this policy is to demonstrate Symbiosis International commitment to always handling personal information in a safe and secure manner, and ensuring the privacy of the information.

## 2 SCOPE

This policy applies to all personnel and activities undertaken by Symbiosis International, including its Board Members, Employees, Volunteers, Contractors, Donors and Partner organisations.

## 3 RATIONALE

To ensure compliance with relevant legal obligations, provide guidelines for the handling of information provided to Symbiosis International. And provide information on privacy to the supporters of Symbiosis International. This policy guides how Symbiosis International handles data impacted by Australian Privacy Principles and relevant legislation.

## 4 POLICY STATEMENT

### TYPE OF INFORMATION COLLECTED

- 3.1 Personal information is collected from donors, potential donors, event participants, advocacy and other supporter groups and people that sign up to receive Symbiosis International communications.
- 3.2 Personal or sensitive information may be collected by Symbiosis International, depending on the reason for the collection of such information. The collection of this information would only be required if it is necessary to provide the services required to the person, including the provision of a tax-deductible receipt/statement.
- 3.3 Should a person choose not to provide information when requested by Symbiosis International, it may not be practicable for Symbiosis International to service the request of the individual, including issuing a tax deductible receipt.

- 3.4 In the instance where Symbiosis International receives unsolicited personal and/or sensitive information, Symbiosis International will destroy or de-identify the information as soon as practicable or lawful to do so.

### COLLECTION OF PERSONAL INFORMATION

- 3.6 Staff, volunteers and contractors may collect personal information from individuals from time to time.
- 3.7 Where possible, information will be obtained directly from the owner of the information via phone, face to face on our website, email, SMS, electronic and hard copy forms, social media and third party on line portals. Symbiosis International may collect information by a third party, but does not purchase marketing/information lists.
- 3.8 Symbiosis International will generally obtain consent from the owner of the personal information to collect their information. This may be providing in writing, orally or implied by the personal engagement with the representative of Symbiosis International.
- 3.9 Personal information will only be requested if it is reasonably necessary for the activities that an individual is seeking to be involved in.

### USE OF PERSONAL INFORMATION

- 3.10 Personal Information will be used for the following purposes:
- To identify an individual
  - For the purpose for which the personal information was originally collected
  - For a purpose for which an individual has consented
  - For any other purpose for authorised or required by an Australian law
  - For any other purpose authorised or required by a court of tribunal.
- 3.11 Symbiosis International uses personal information to further its mission and is usually used for fundraising, charitable, aid relief and development, education and related activities. This includes, but is not limited to, processing donations, issuing receipts and other Symbiosis International material, contact management for Symbiosis International staff and representatives, and analysis to personalise and improve supporter engagement.

- 3.12 Symbiosis International may publish images of supporters, staff, contractors and volunteers in publications, on social media or in public advertisements, after obtaining informed consent where practicable.

### DIRECT MARKETING

- 3.13 From time to time, Symbiosis International may send supporters updates and information consistent with its mission and future development. Supporters are provided with the option to unsubscribe from communications and may contact Symbiosis International's Privacy Officer if they do not wish to receive such information.

### STORAGE OF PERSONAL INFORMATION

- 3.14 Symbiosis International ensures all reasonable steps are taken to protect the personal information it holds from misuse and loss from unauthorised access, modification or disclosure. Supporters personally identifiable information is kept secure.
- 3.15 Secure means closed storing of paper records, firewalls, password restricted access to computerised records, routine security risk assessments and internal policies in relation to access to personal information.
- 3.16 Only authorised employees and volunteers have access to this information.

### MAINTAINING ACCURATE AND UP TO DATE INFORMATION

- 3.17 Symbiosis International is committed to holding accurate and up-to-date personal information
- 3.18 Individuals are encouraged to contact Symbiosis International at any time to update their personal information. This can be done by contacting a Symbiosis International CFO, or his delegate
- 3.19 Symbiosis International will destroy or de-identify any personal information which is no longer required by the organisation for any purpose for which the organisation may use or disclose it, unless Symbiosis International is required by law or under an Australian law or court order to retain it.

## ACCESS OF PERSONAL INFORMATION BY INDIVIDUALS

- 3.20 If an individual wants to access a copy of their personal information that is held by Symbiosis International, they can do so by contacting the CFO.
- 3.21 In accordance with the Privacy Act, Symbiosis International may refuse access to personal information that Symbiosis International holds in a number of circumstances including where giving access to the information would pose a serious threat to the life, health or safety of a person, giving access would have an unreasonable impact on the privacy of a person, the information relates to existing or anticipated legal proceedings and would not be available under the discovery process, or denying access is required or authorised by an Australian law or court order.
- 3.22 Symbiosis International will handle all requests for access to personal information as quickly as possible.

## 4 RESPONSIBILITIES

### COMPLIANCE MONITORING AND REVIEW

- 4.1 Compliance with this Policy is the responsibility of all staff. It is the responsibility of the CEO to ensure all staff are aware and enact their obligations accordingly.
- 4.2 Review of this policy and privacy is the responsibility of the Finance and Risk committee in partnership with the Privacy Officer.

### REPORTING

- 4.3 Should an individual have any concern about the personal information being used by Symbiosis International in any of these ways, they must notify the Privacy Officer of Symbiosis International at [officebne@symbiosis-int.org](mailto:officebne@symbiosis-int.org)
- 4.4 If an individual has any questions, comments or complaints about the Privacy Policy of Symbiosis International or handling of information. Please contact Symbiosis International CFO, in their role as the Privacy Officer on 07 3355 5985 between 9am to 5pm AEST Monday to Friday.

4.4.1 Alternatively, an email can be sent to [officebne@symbiosis-int.org](mailto:officebne@symbiosis-int.org)

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or write to Privacy Officer, PO Box 6166, Mitchelton, QLD 4053  
Symbiosis International takes all feedback seriously and any feedback on the principles or handling of information of the Privacy Policy will be investigated and assessed by the Privacy Officer.

4.4.2 The feedback will be responded to within a reasonable timeframe from the initial receipt.

4.4.3 Further information about individual privacy rights and privacy law can be obtained from the Office of the Australian Information Commissioner by:

- Calling the Privacy Hotline on 1300 363 992
- Visiting the website: <http://www.oaic.gov.au>
- Writing to the Australian Information Commissioner, GPO Box 5218, Sydney NSW 1042.

## DISCLOSURE

4.4 Symbiosis International will not pass on information to third parties except in the following circumstances:

4.4.1 Information is given to financial institutions/intermediaries for normal banking processing in which case there is a contractual expectation of confidentiality.

4.4.2 Information is given to communication service providers for bulk processing in which case there is a contractual expectation of confidentiality.

4.4.3 The Australian Tax Office or other government authority or Australian law or court order required or authorised disclosure of information.

4.4.4 An individual has consented to Symbiosis International disclosing their personal information to a third party.

4.4.5 Other parties, including agents and contractors, have agreed to keep information secure and confidential in line with the Australian Privacy Principles.

4.5 When disclosing personal information to a third party, Symbiosis

International will take reasonable steps to ensure that the third party does not breach the Australian Privacy Principles in relation to the information.

4.6 Symbiosis International may disclose an individual's personal information to a recipient overseas in accordance with the Australian Privacy Principles where:

4.6.1 The individual has consented to the disclosure; or

4.6.2 Symbiosis International reasonably believes that the overseas recipient is subject to a law or binding scheme that protects the information in a way that is substantially similar to the way the information is protected under the Privacy Act and the Australian Privacy Principles; or

4.6.3 The disclosure is required or authorised by an Australian law or court order.

## 5 DEFINITIONS

**Sensitive information:** a special category of personal information. Sensitive information means information or an opinion about an individual's racial or ethnic origin; political opinions; membership of a political association; religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record. Sensitive information also includes health information about an individual or genetic information that is not otherwise classified as health information.

## 6 APPENDIX

Privacy Act 1988 (Cth)