

Privacy Policy

JUNE 2024, VERSION 3

1 Introduction

Union Aid Abroad - APHEDA is the global justice organisation of the Australian union movement and expresses the Australian unions' commitment to social justice and international solidarity for human rights and development through support for overseas education, capacity building and development projects.

Union Aid Abroad – APHEDA treats the privacy of an individual's data with all care and due diligence and is committed to treating information responsibly.

This policy has been developed to provide a guide to the treatment of data, to protect an individual's data and to set standards for the organisation in accordance with Australian privacy laws and requirements.

2 Definition

Personal Information means information or an opinion, whether true or not, and whether recorded in a material form or not, about an identified individual, or an individual who is reasonably identifiable.

Sensitive Information is a subset of Personal Information. It includes information or 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 preferences or practices, criminal record or health information about an individual.

3 Purpose of the policy

Through our work in fundraising and educating Australians, Union Aid Abroad – APHEDA collects and keeps data from supporters in Australia. We collect information from workers, volunteers, contractors and job applicants and also keep information about our overseas partner organisations including contact information and data concerning individuals assisted by these organisations.

The purpose of this policy is to provide guidelines on the management of data and provide assurance that data is managed in an accountable fashion and in adherence with Australian laws.

Union Aid Abroad-APHEDA complies with the Privacy Act 1988 (Cth) (Privacy Act) and the Australian Privacy Principles (APPs). This Privacy Policy (Policy) should be read in conjunction with the Privacy Act and the APPs.

4 Scope

This Policy applies to all Union Aid Abroad – APHEDA personnel, offices and projects and may concern the actions of any staff or volunteers.

This Policy applies to personal information that Union Aid Abroad-APHEDA collects from you:

- via one of our websites;

- via social media;
- via telephone;
- via email;
- via fax;
- in person; and/or
- in writing.

Union Aid Abroad-APHEDA collects, holds, uses and discloses your personal information including your email address to:

- manage Union Aid Abroad-APHEDA's relationship with you, including your donations;
- inform you about campaigns;
- conduct surveys and research;
- to subscribe you to Union Aid Abroad-APHEDA email newsletters

Personal information provided by workers, volunteers, contractors, job applicants and overseas partner organisation contacts is used for the purposes it is provided.

5 Principles

Union Aid Abroad – APHEDA's Privacy Policy includes the following principles:

- Information is only collected from you when required to perform the functions of the organisation, for example for the processing of donations and engagement in campaigns or actions.
- Where we collect information from an individual, that individual can choose what information to provide to us and request changes or access to that data at any time.
- We do not sell personal information.
- If a person is involved in a safeguarding or fraud-related incident then data may be collected such as name and contact details and information about the incident. If you do not wish for us to collect your name or contact details in such incidents, you can choose to report incidents anonymously.
- We take reasonable steps to ensure that our systems and processes protect personal information held by Union Aid Abroad – APHEDA from misuse, unauthorised access and disclosure

6 Guidelines

Union Aid Abroad regularly asks for information that helps us engage with those that donate or are engaged in a campaign coordinated through us. For example, to process a donation and provide a receipt, or to record your support of a petition or letter to your local MP. It is an individual's choice as how much information they provide (however a request may not be able to be met without certain information).

From time to time you may voluntarily supply your personal information to Union Aid Abroad-APHEDA. Union Aid Abroad-APHEDA will also record your e-mail address if you send us a message, subscribe to an email newsletter, or complete a form if this information is requested.

Union Aid Abroad-APHEDA only collects personal information that is necessary for the organisation to perform its functions and/or activities.

Depending upon the circumstances, Union Aid Abroad-APHEDA may collect information such as, but not limited to:

- Your name or date of birth
- Contact details (address, email, phone number);
- Your online activity or social media details (e.g. blogs, twitter, Facebook, LinkedIn);
- your gender;
- Payment information for donations;
- Interests and opinions
- Support for campaign and fundraising activity for example, conversations by phone or email with staff and volunteers
- Communications preferences; and
- Your inquiry or complaint details.

Some personal information is considered sensitive information and includes:

- Your union membership (if any).
- Criminal history checks for workers, volunteers and study tour participants.
- Health information for study tour participants.

7 Sensitive information

We will only collect sensitive information where we have received your consent to that information being collected, used, disclosed and stored by Union Aid Abroad-APHEDA in accordance with this Policy, and provided that the collection is reasonably necessary for us to pursue one or more of our functions or activities.

Where you provide information to Union Aid Abroad-APHEDA in relation to a job application the personal information you provide will only be collected, held, used and disclosed for the purposes of considering your potential employment with Union Aid Abroad-APHEDA. Where you provide the details of referees, you confirm that you have informed the referees that you are providing their contact information to Union Aid Abroad-APHEDA and they have consented to Union Aid Abroad-APHEDA contacting them and discussing the personal information you have provided in relation to the job application.

We will collect personal information directly from you unless:

- you have consented to APHEDA's collection of your personal information from third parties; or
- when we are legally required to do so; or
- it is unreasonable or impractical to do so.

If we receive unsolicited personal information about or relating to you and we determine that such information could have been collected in the same manner if we had solicited the information, then we will treat it in the same way as solicited personal information and in accordance with the APPs. Otherwise if we determine that such information could not have been collected in the same manner as solicited personal information, and that information is not contained in a Commonwealth record, we will, if it is lawful and reasonable to do so, destroy the information or de-identify the information.

8 Websites

Union Aid Abroad-APHEDA websites collect two types of information. The first type is anonymous information. The web server may make a record of your visit and log the following information for statistical purposes:

- the user's server address;
- the user's top level domain name (e.g. .com, .gov, .net, .au, etc.);
- the date and time of the visit to the site;
- the pages accessed and documents downloaded;
- the previous site visited; and
- the type of browser used.

No attempt will be made to identify users or their browsing activities except, in the unlikely event of an investigation, where a law enforcement agency may exercise a warrant to inspect the internet service provider's logs.

The second type of information that Union Aid Abroad-APHEDA websites collect is personal information. Personal information is requested in order to provide personalised and enhanced services that are not available to anonymous users. A cookie is a piece of data stored on the user's computer tied to information about the user. Cookies may be used on APHEDA websites.

Our websites may contain links to other websites and social media pages including Facebook, Twitter and LinkedIn. We are not responsible for the privacy policies of the entities responsible for those websites and we recommend that you review the privacy policies applicable to any other websites you visit.

9 How we hold and use your information

You consent to our use and disclosure of your personal information for the purposes of direct marketing which may include providing you with information about events, products or services which may be of interest to you.

If you do not want us to use your personal information for direct marketing purposes, you may elect not to receive direct marketing at the time of providing your personal information.

Unsubscribing and opting out

If you no longer wish to receive direct marketing or other communications, you may request at any time to cancel your consent to such communications as follows:

- If subscribing to an email newsletter you may "unsubscribe" at any time from the newsletter mailing list;
- Union Aid Abroad-APHEDA may, from time to time, send you text messages about issues of importance such as events or campaigns or administrative matters. You may "opt out" by texting STOP in reply to a text message from APHEDA;
- You may contact us at any time by mail or email directed to our Privacy Officer.

Disclosure of your personal information

Union Aid Abroad-APHEDA may disclose your personal information, in connection with or to further the purposes outlined above, to:

- government bodies or agencies (if required by law);
- organisations to whom we outsource functions (including information technology providers, print service providers, mail houses, call centres, email service providers);
- otherwise as you have consented; and/or
- otherwise as required by law.

How Union Aid Abroad-APHEDA holds personal information

Union Aid Abroad-APHEDA holds electronic personal information on data servers that are password protected and login secured. However, by providing personal information to Union Aid Abroad-APHEDA you consent to your information being stored and processed on a data server or data servers (such as cloud services) owned by a third party or third parties that may be located outside of Australia.

Union Aid Abroad-APHEDA will take reasonable steps to ensure that any third party providers comply with the APPs, or are subject to a law or scheme that is at least substantially similar to the way in which the APPs protect information.

Wherever reasonably practicable Union Aid Abroad-APHEDA holds physical personal information in access controlled premises.

When Union Aid Abroad-APHEDA no longer requires your personal information for a specific purpose and we are not required to keep it to comply with any laws, we will take such steps as are reasonable in the circumstances to destroy your personal information or to ensure that the information is de-identified.

How you may seek access and/or correction to personal information held by Union Aid Abroad-APHEDA

You have the right to request access to your personal information and request that it be updated or corrected. To request access to, correction of, or updating of any personal information held about you, please write to the Union Aid Abroad-APHEDA Privacy Officer at the following address:

Privacy Officer

Union Aid Abroad-APHEDA

Level 1, 365-375 Sussex St

Sydney 2000

E: privacy@apheda.org.au

General enquiries can be made via telephone by calling the following number:

P: +61 (0)2 9264 9343

Union Aid Abroad-APHEDA requires that you provide proof of identity in order to seek access to your personal information. Union Aid Abroad-APHEDA may refuse to provide access if permitted to do so by law or under the APPs. Union Aid Abroad-APHEDA will seek to provide you with access to your personal information within 30 days of receipt of a valid request and may charge you a reasonable fee for doing so.

You can contact Union Aid Abroad-APHEDA to let us know if any of your personal information has changed. Please contact the Union Aid Abroad-APHEDA Privacy Officer in writing to update any personal information. Union Aid Abroad-APHEDA may also take steps to update your personal information by reference to publicly available sources such as telephone directories or electoral rolls.

Notification of breach

While Union Aid Abroad – APHEDA takes reasonable steps to secure personal information, no data transmission over the internet can be guaranteed as secure. If there is an unauthorised access or disclosure or loss of Personal Information likely to result in serious harm to an individual, Union Aid Abroad – APHEDA will undertake appropriate investigative and remedial action and comply with the Mandatory Notification Data Breach regime in Part IIC of the Privacy Act.

10. Complaints

How you may complain about a breach of the APPs

To make a complaint about an alleged breach of the APPs please write to or email the Union Aid Abroad-APHEDA Privacy Officer at one of the following addresses:

Privacy Officer

Union Aid Abroad-APHEDA

Level 3, 377 Sussex St

Sydney 2000

E: privacy@apheda.org.au

All complaints must be written. Please provide all details about your complaint as well as any supporting documentation to the Union Aid Abroad-APHEDA Privacy Officer.

How Union Aid Abroad-APHEDA will deal with complaints

The Union Aid Abroad-APHEDA will seek to deal with privacy complaints as follows:

- complaints will be treated seriously;
- complaints will be dealt with promptly;
- complaints will be dealt with confidentially;
- complaints will be investigated by the Union Aid Abroad-APHEDA Privacy Officer; and
- the outcome of an investigation will be provided to the complainant where the complainant has provided proof of identity.

Union Aid Abroad-APHEDA will seek to respond within 30 days of receipt of a valid complaint.

Variations to the Policy

This Policy may be varied from time to time and an updated version will be posted on the Union Aid Abroad-APHEDA's websites. Please check our websites regularly to ensure that you have the most recent version of the Policy.

11 Direct Debit Request Service Agreement

1. By signing a direct debit request, you have authorised APHEDA Inc. (APCA User ID 062529) to arrange for the specified funds to be debited from your nominated account on the 15th of each month (except if the due date falls on a non-working day or public holiday, the payment will be processed on the next/previous working day) until you request in writing to stop or alter such debit arrangements.

2. APHEDA Inc will provide you with fourteen (14) days notice if we propose to vary the direct debit service agreement.

3. If you wish to alter, cancel or defer a debit payment, you can phone us on 02 9264 9343, write to Union Aid Abroad-APHEDA at Level 1, 365-375 Sussex St, Sydney, NSW 2000, or email office@apheda.org.au at least three (3) working days prior to the next debit date.

4. It is your responsibility to ensure sufficient cleared funds are in the nominated account where the payments are to be drawn. If there are insufficient funds in your account to meet a debit payment, you are responsible for any fees and/or interest your financial institution may charge you.

5. The donor should be aware that Direct Debiting through the Bulk Electronic Clearing System (BECS) is not available on all accounts. Account details should be checked against a recent statement from your financial institution. If you are in any doubt, you should check with your ledger financial institution before completing the drawing authority.

6. All information in your direct debit request is confidential and secure. We will make reasonable effort to ensure that our employees who have access to your information will not make any unauthorised use, modification, reproduction or disclosure of that information. Information will only be disclosed to the extent specifically required by law; or for the purposes of this agreement (including disclosing information in connection with any query or claim).

12 External: Legislative and Regulatory Framework

Privacy Act 1988 (Cth) (Privacy Act) and the
Australian Privacy Principles (APPs) – Privacy Amendment Act 2012

13 Document Control

Version	Revision Description	Approved by Board (date)
1	Original	Dec 2002
2	Update	November 2005
3	Full review to meet new APP standards	September 2014
4	Full review	June 2024