Power to Change Privacy Policy

Protecting Your Privacy

This Privacy Policy applies at all times to the activities and operations of Power to Change (PTC), and any sub-entities for which it provides services, including Global Aid Network.

PTC is committed to the responsible and respectful use and protection of personal information, in accordance with the Privacy Act 1988 (Cth).

'Personal information' means information or an opinion about an identifiable individual, or an individual who is reasonably identifiable.

By engaging with PTC websites, mobile apps or other digital tools, by using any PTC services, or by otherwise providing PTC with your personal information (or authorising it to be provided by someone else), you agree to your personal information being handled as set out in this policy.

What personal information does PTC collect and hold?

PTC only collects personal information that is necessary for the provision of its services. Personal information held by PTC may include:

- Contact information, such as name, phone number, mailing address and email address;
- Payment information, as needed to securely process payments, issue receipts and provide payment history if required;
- Occupation details or other details regarding your circumstances;
- Personal preferences, such as communication preferences or areas of special interest;
- Background and compliance checks and safeguarding clearances;
- Location data, being information about your physical location, including IP address;
- The type, name and date of events attended;
- Other information, such as date of birth, previous names, qualifications and tax file number, as required to comply with the law; and
- Information concerning individuals from Australia and overseas with whom PTC has an agreement.

Where PTC collects your tax file number (TFN), it will only use or disclose that information as permitted under the Privacy (Tax File Number) Rule 2015 and taxation law, will not use it to verify your identity for other purposes, and will take additional steps to securely store and, when no longer required, destroy or permanently de-identify that information.

How does PTC collect personal information?

PTC may collect your personal information in a range of ways, including physical and online forms, face-to-face meetings and interviews, emails and application platforms, telephone calls, and website surveys, whether hosted by PTC or a third party. This information may be held in electronic or non-electronic form.

In most cases, PTC collects personal information directly from you. Your consent for collection, retention, and use of your personal information by PTC for the purposes for which it is provided, will be sought before collection.

PTC may also collect information from a third party where it is impractical to collect it directly from you — for example, from an organisation or individual registering you for a PTC activity, where you have authorised them to do so on your behalf.

Anonymity and using a pseudonym

Where it is lawful and practicable, you may interact with PTC anonymously or using a pseudonym — for example, when making a general enquiry. In most cases, however, it is not practicable for PTC to deal with you anonymously or pseudonymously, because PTC needs to verify your identity or maintain accurate records in order to process donations, register you for events, conduct background and safeguarding checks, or otherwise provide its services or comply with the law.

Third-party use of personal information

Where an organisation provides personal information to PTC, that organisation warrants to PTC that it has complied with the Privacy Act in collecting and holding that information, and that providing it to PTC is not a breach of the Act.

Sensitive information

Some of the information PTC collects may be sensitive information. The type of sensitive information collected depends on the nature of a person's contact with PTC.

The most common form of sensitive information PTC collects relates to religious belief. For example, PTC may seek information about your religious beliefs (including assent to a Statement of Faith), the church you attend, and your broader involvement in ministry activities, in order to assess your suitability for appointment as a board or committee member, missionary, volunteer or service provider, or for involvement in a particular activity.

Health information may also be collected from applicants for ministry with PTC, and from event participants, where required for planning appropriate catering or activities.

Some prayer requests may also contain sensitive information.

PTC will only collect sensitive information about you — such as information about your religious beliefs or health — with your express consent, unless an exception under the Privacy Act applies (for example, where collection is required or authorised by law, or is necessary to lessen or prevent a serious threat to life, health or safety). Where PTC seeks your consent to collect sensitive information, it will explain why that information is needed and how it will be used.

Unsolicited personal information

If you provide PTC with personal information that PTC has not requested, PTC will generally delete or destroy it as soon as practicable after receipt, unless the law otherwise requires or permits PTC to keep it, or you agree to PTC retaining it.

Why does PTC collect, hold and use your personal information?

PTC only collects, holds and uses personal information for the purpose for which it was provided, for related purposes within your reasonable expectations, or as otherwise permitted or required by law. These purposes may include:

- Keeping you informed about matters that interest you;
- Processing authorised payments to and from you;
- Processing enquiries or applications;
- Convening meetings or other events;
- Providing you with requested information or services, including spiritual guidance, coaching and other tools;
- Complying with legislation, including (but not limited to) the Australian Charities and Not-for-profits Commission Act 2012 and the Income Tax Assessment Act 1997 / Taxation Administration Act 1953; and
- Any other purpose identified at the time your personal information was collected.

Direct marketing

PTC may use your personal information to send you direct marketing communications about PTC's activities, appeals, events and services — including by mail, email, SMS or telephone — where you would reasonably expect PTC to do so or where you have consented. Every direct marketing communication PTC sends will include a simple way for you to opt out of receiving further communications of that kind, and you may also opt out at any time by contacting the Privacy Officer using the details below. PTC will not disclose your personal information to another organisation for that organisation's own direct marketing purposes without your consent.

How your information is protected

PTC takes reasonable steps to protect the personal information it holds from misuse, loss, and unauthorised access, modification or disclosure. For example, PTC has implemented:

- Security procedures for access to internal office areas;
- Security procedures within offices, including locked filing cabinets for particularly sensitive personal information;
- IT security procedures, including password protection and virus-scanning tools; and
- Confidentiality requirements for missionaries, employees and volunteers, as set out in PTC's privacy procedures and employment contracts.

Who does PTC disclose personal information to?

PTC will never disclose your personal information to another entity for the purpose of that entity soliciting charitable donations from you.

PTC may disclose your information to government bodies, regulators and law enforcement agencies, and to other parties where authorised or required by law.

PTC may also disclose your personal information to any other entity identified at the time of collection, or which you subsequently request or expressly consent to PTC disclosing your information to.

Will PTC disclose personal information to overseas recipients?

PTC does not disclose your personal information to overseas recipients unless there is a specific reason for doing so and you have given your consent.

Where such disclosure occurs, it is generally in connection with PTC's international ministry partners and missionaries. The countries in which those recipients are typically located include North America/Oceania region. PTC will take reasonable steps to ensure that any overseas recipient handles your personal information consistently with the Australian Privacy Principles, except where an exception under the Privacy Act applies.

If you submit personal information for publication on the PTC website, you consent to it being published on the internet and made available worldwide.

Website use of cookies

PTC websites may use both session cookies and persistent cookies.

Session cookies are short-lived, used only during a browsing session, and expire when you close your browser. They are used during normal website navigation and when accessing dynamic content, such as forms and restricted content; a session cookie may identify you only if you are logged in to a site to which you have been granted access. Persistent cookies are stored on your computer, contain an expiry date, and may be used to track browsing behaviour — but do not identify you.

How can personal information be accessed, corrected or updated?

You may access the personal information PTC holds about you, subject to any legal restrictions or exemptions, by contacting the Privacy Officer using the details below.

PTC will not charge you for a request to access your personal information, except where PTC may charge a reasonable fee (notified to you in advance) to cover time and expenses in the following circumstances:

- Where an extended amount of time is required to collate and prepare material for you; or
- Where you request that files be photocopied for you.

PTC takes reasonable steps to ensure the personal information it holds about you is accurate, complete and up to date, but also relies on you to advise PTC of any changes in a timely manner.

If any changes are required to your personal information, or you believe the information PTC holds about you is inaccurate, incomplete or out of date, please contact the PTC worker responsible for your services so records can be amended. If you are unsure who that is, contact the Privacy Officer using the details below.

Special rules for children

PTC does not collect personal information from children under 13 beyond what is necessary for them to participate in PTC's online or other activities, such as registering for a conference or downloading materials, which usually requires parental permission. If PTC discovers that it has inadvertently collected personal information from a child under 13, it will delete that information as soon as reasonably possible.

Where a child under 16 in the European Economic Area (EEA), or under 13 elsewhere, wishes to register with a PTC tool, purchase products or materials, or participate in an activity requiring personal information, a parent or guardian must give permission and consent on the child's behalf. PTC only collects information from a child that is necessary for their

participation — for example, an address for making a purchase. Parents may request at any time that information collected about their child be removed from PTC's records.

Additional information for individuals in the European Union

The EU General Data Protection Regulation (GDPR) gives certain rights to individuals in the European Economic Area (EEA) and imposes certain obligations on organisations holding their personal information. For GDPR purposes, the United Kingdom is included among the countries where the Regulation applies. This section supplements the Policy only for individuals located where the GDPR applies.

In this section, 'Data' means personal information relating to an identifiable natural person, and 'Process' means the way Data is collected, stored and used.

Where the GDPR applies, PTC will comply with it, including the six principles governing how Data must be processed:

- Lawfulness, fairness and transparency — PTC will obey the law, Process Data only in ways people would reasonably expect, and be transparent about its data protection practices;
- Purpose limitation — PTC will Process Data only for the specific purpose for which it was collected;
- Data minimisation — PTC will not Process more Data than is needed for its usual operations or other legitimate purposes;
- Accuracy — PTC will take reasonable steps to ensure the Data it holds is adequate and accurate;
- Storage limitation — Data will not be stored for longer than PTC considers necessary for the purpose it was collected;
- Security — Data will be Processed with appropriate security.

Data Controller

PTC is a 'Data Controller' under the GDPR (determining which Data are Processed by PTC). PTC's contact details are set out in the Complaints section below. PTC will appoint a data protection officer (the Privacy Officer), who individuals may contact regarding their Data and to exercise their rights under the GDPR.

Collecting and processing Data

By providing Data to PTC, an individual consents to PTC Processing that Data in the course of its usual operations, until that consent is withdrawn. An individual may withdraw consent at any time by contacting PTC.

Where Data is collected for a contractual reason, PTC will advise the individual of that reason at the time of collection. If an individual chooses not to provide Data requested for a contractual reason, PTC may be unable to enter into the contract or provide the relevant services.

Where Data is collected for PTC's legitimate interests and no other legal basis applies, PTC will carry out a legitimate interests assessment to ensure Processing complies with the GDPR.

PTC will store Data until it is no longer required for PTC's usual operations, or until the individual to whom the Data relates requests its removal or erasure.

Data transfers

PTC may transfer and store Data it collects about an individual in countries other than where it was originally collected, including Australia. When doing so, PTC will protect the Data as set out in this Policy and, where applicable, comply with the GDPR. Where an individual providing Data is located in a country where the GDPR applies, PTC will only transfer that Data where appropriate safeguards are in place.

Right to erasure and rectification of Data

In certain circumstances, an individual has the right under the GDPR to request that PTC delete or remove their Data, where:

- The Data is no longer required for the purpose for which it was collected;
- The individual has withdrawn consent and no other legal basis exists for holding or processing the Data; or
- Another ground exists under the GDPR.

An individual may contact the Privacy Officer, using the details in the Complaints section, to:

- Object to the Processing of their Data;
- Request rectification of their Data; or
- Request deletion of their Data.

The Privacy Officer will seek to deal with such requests without undue delay and in accordance with GDPR requirements. If an individual is not satisfied with PTC's response, they may lodge a complaint with the relevant supervisory authority.

Responding to data breaches

Power to Change will take appropriate, prompt action if it has reasonable grounds to believe that a data breach has occurred. Depending on the type of data breach, this may include a review of internal security procedures, taking remedial internal action or, in the event of a notifiable data breach under the Act, notifying affected individuals and the Office of the Australian Information Commissioner.

Complaints

You may contact the Privacy Officer if you have any concerns or complaints about how PTC has handled your personal information, including any breach of this policy. The Privacy Officer will investigate and provide a written response as quickly as reasonably possible.

If you are not satisfied with that response, you may appeal to the PTC National Director or the Chair of the PTC Board for the matter to be reviewed.

If you remain unsatisfied, you may lodge a complaint with the relevant regulator — in Australia, the Office of the Australian Information Commissioner (OAIC).

Contacting the PTC Privacy Officer

privacy.officer@powertochange.org.au

PO Box 565 Mulgrave VIC 3170

This Privacy Policy may be revised from time to time.