

Ardoch Limited Privacy Policy

Contents

| | | |
|-----|---|----|
| 1 | General..... | 1 |
| 1.1 | Who we are..... | 1 |
| 1.2 | About this Privacy Policy..... | 1 |
| 1.3 | Acceptance of this Privacy Policy..... | 1 |
| 1.4 | Changes to this Privacy Policy..... | 1 |
| 1.5 | Questions/ contact us..... | 1 |
| 2 | What types of personal information do we collect?..... | 2 |
| 2.1 | Types of personal information..... | 2 |
| 2.2 | Sensitive information..... | 3 |
| 3 | What if you don't provide us with your personal information?..... | 3 |
| 4 | How do we collect personal information?..... | 3 |
| 5 | Why do we collect personal information?..... | 4 |
| 5.1 | Primary purposes..... | 4 |
| 5.2 | Secondary purposes..... | 5 |
| 6 | Who do we disclose your personal information to?..... | 6 |
| 7 | Cross border disclosures..... | 6 |
| 8 | Storage, security and destruction of the information we hold..... | 7 |
| 8.1 | Storage..... | 7 |
| 8.2 | Security..... | 7 |
| 8.3 | Notifiable Data Breaches..... | 7 |
| 8.4 | Destruction..... | 8 |
| 9 | Website..... | 8 |
| 9.1 | Website security..... | 8 |
| 9.2 | Cookies..... | 8 |
| 9.3 | Third party websites..... | 8 |
| 10 | Accessing and correcting personal information..... | 8 |
| 11 | Complaints..... | 9 |
| 12 | Contact Us..... | 10 |

1 General

1.1 Who we are

Ardoch Limited (**we** or **Ardoch**) is a children's charity that provides education support for disadvantaged children and young people. Ardoch delivers tailored education and wellbeing programs that address barriers to education, develop skills and broaden horizons. Ardoch mobilises volunteers to support students in schools and early childhood centres and advocate for change to reduce inequity in education.

1.2 About this Privacy Policy

This Privacy Policy explains how Ardoch collects, uses, discloses and otherwise handles personal information in accordance with the Australian Privacy Principles (**APPs**) which are contained in the *Privacy Act 1988* (Cth) (**Privacy Act**).

For the purposes of this policy, 'personal information' means information or an opinion about an identified individual, or an individual who is reasonably identifiable.

1.3 Acceptance of this Privacy Policy

If you visit our website, contact us for services, apply for or use one of our programs; or if you apply to become, or become, an employee or volunteer of Ardoch, you will be taken to have accepted this Privacy Policy, and consented to Ardoch collecting, maintaining and using your personal information (whether it is provided by you or a third party) in accordance with this Privacy Policy.

You must specifically inform us in writing if you wish to withdraw that consent.

1.4 Changes to this Privacy Policy

We may amend this Privacy Policy at any time. This Privacy Policy is in addition to any other terms and conditions applicable to our website.

Any updated versions of this Privacy Policy will be posted on our website and will be effective upon posting. Please review it regularly.

1.5 Questions/ contact us

If you have any questions or feedback about this policy or the way in which Ardoch handles personal information, you can contact us on the details set out below in Section 12 (Contact Us) of this Policy.

2 What types of personal information do we collect?

2.1 Types of personal information

We only collect personal information if it is necessary for one of our functions or activities. The type of personal information we collect will depend on the reason for collection (examples below). Generally, the types of personal information we collect will include name, contact details and records of communication with us.

For example:

- If you use or participate in any of our programs, we may collect your name, contact details, details of your guardian (if applicable), financial details (if necessary to confirm your eligibility for our programs), information about your circumstances, and information about the matter you are seeking assistance with.
- If you make a donation to Ardoch, we may collect your name, organisation, contact details, the amount and frequency of your donation, bank account and payment details. Credit card details are encrypted.
- If the purpose for collection is related to correspondence (hard copy and electronic newsletters), or referrals, we may collect your name, telephone numbers, street and email address, occupation, and any other information you may provide from time to time.
- If you are applying for a job with us, we may collect information you include in your job application (including your cover letter, resume, contact details and referee reports), and information about your police record, Working With Children Check, 'Blue Card' (or relevant state-specific child safeguarding checks as may apply) before we can offer you employment.
- If you are applying for a volunteer position with us, we may collect information you include in your volunteer application (including your cover letter, resume, contact details and referee reports), and information about your police record, Working with Children Check, 'Blue Card' (or relevant state-specific child safeguarding checks as may apply) before we can offer you a volunteer placement.
- If you send us an enquiry, we may collect your name, contact details, information about your circumstances and details of your query.
- If you make a complaint, we may collect your name, contact details, the details of your complaint, information collected in any investigation of the matter and details of the resolution of the complaint.

- If you participate in our surveys, we may collect your name, organisation contact details and your survey responses.

2.2 Sensitive information

Some personal information, such as information relating to racial or ethnic origin, religious beliefs or affiliations, health information (including mental health information and information about a disability), and whether or not you have a criminal record is sensitive and requires a higher level of protection under the Privacy Act. We may collect your sensitive information when we have your consent and when the collection is reasonably necessary for us to carry out one or more of our functions or activities.

Sensitive information may be relevant to our assessment of whether a recipient is eligible for our programs, or for an employment or volunteer position.

3 What if you don't provide us with your personal information?

Personal information requested by Ardoch does not have to be provided. However, without that information, Ardoch may not be able to process an application, fulfil a request or provide an appropriate level of service.

In some circumstances we allow individuals the option of not identifying themselves, or of using a pseudonym, when dealing with us (for example, when browsing our website or making general phone queries).

4 How do we collect personal information?

We collect personal information in a number of ways, including:

- through our website (for example, if you choose to donate to Ardoch online through our secure payment gateway or apply for a volunteer role)
- via third party donation platforms or other fundraising initiatives
- when you correspond with us (for example by letter, fax, email or telephone)
- when you participate in surveys after participating in our programs
- on hard copy forms
- in email or online forms
- in person (for example, at job interviews)
- at events and forums
- from third parties or referrers who refer you to us for assistance with your consent

Our website server host may collect the domain names and names of the referring website (not the email addresses of visitors). The Internet Service Provider (ISP) may

aggregate information to measure the number of visits, average time spent on the website and pages viewed. We may use this information to help improve the operational performance and informational content of our website.

On occasions we may also need to source personal information from a third party. Such third parties could include an employer to confirm a person's details, or an agent engaged by us, such as a solicitor, to collect information on our behalf, or a person named as a referee in another application for one of our programs or services. We may also collect information about a person from publicly available sources such as government agencies.

We do **not**:

- collect any personal information from visitors to our website except where the visitor initiates this, for example by inquiring or seeking information about our programs, or by making a donation online;
- collect information about online visitors from other sources, such as private organisations, public records or bodies;
- engage in online 'spamming' or online mass-outbound marketing activities; or
- release personal information or "data lists" for the purpose of commercial sale.

5 Why do we collect personal information?

We may use your personal information for the primary purpose for which it is collected (e.g. the provision of our education and wellbeing program services) or for purposes related to the primary purpose where it would be reasonably expected that we would use the information in such a way, or in other limited circumstances as set out in the Privacy Act.

5.1 Primary purposes

The main purposes for which we collect, hold, use and disclose personal information are set out below.

Delivering programs

- responding to service or information requests
- processing applications
- identifying programs that may be of benefit
- making contact to provide information about our programs
- helping to process identified requirements for Ardoch programs
- administering and managing needs
- managing and administering effectively the provision of Ardoch programs
- facilitating provision of services by partner support service providers

- facilitating legal and compliance obligations

Fundraising

- seeking funding and donations
- organising fundraising events
- reporting to funding providers

General administration

- recruiting staff, contractors and volunteers
- processing payments
- answering queries and resolving complaints
- evaluating our work and reporting externally

5.2 Secondary purposes

Direct marketing

- Personal information collected by Ardoch may be used for secondary purposes such as direct marketing (i.e. the promotion of programs directly to you including through emails, SMS, phone calls and post). Wherever possible this will be collected directly, but in other instances may be collected from government or publicly available records, phone books or data lists or from third parties such as list brokers, who are privacy compliant. We may also engage in marketing activities where personal information is not used, such as letterbox inserts.
- We will only send you direct marketing materials if you would reasonably expect to receive them or you have consented. If it is impractical to gain your consent, we will always provide a simple means for you to request not to receive the material ('opting out'). We will not use your sensitive information for the purposes of direct marketing unless you have given us prior consent.
- You can opt out of receiving marketing communications from us by:
 - advising us if you receive a marketing call that you no longer wish to receive these calls;
 - using the unsubscribe facility that we include in our commercial electronic messages (such as email and SMS) to opt out of receiving those messages; or
 - contacting us using the details provided under the "Contact" heading on our website, and in Section 12 (Contact Us) of this Policy.

Other secondary purposes

We may collect, use or disclose personal information for other purposes such as:

- providing information about programs (unless requested not to);
- further developing our relationship with you;

- developing and managing alliances, partnerships and joint ventures so as to make available programs and services;
- monitoring supporters/clients satisfaction; and
- managing Ardoch's internal operations and administration functions.

6 Who do we disclose your personal information to?

The nature of the work we do and programs we deliver means that it is often necessary for us to disclose your personal information to other parties. We will ordinarily let you know who we will disclose your personal information to when we collect the information from you (unless there are practical reasons for not informing you).

Common third parties we might need to disclose your personal information to include:

- other support service providers, when we need their assistance
- our funding providers
- financial institutions for payment processing
- referees whose details are provided to us by job applicants
- early childhood centres and schools that we partner with
- our contracted service providers which include:
 - information technology service providers
 - conference, function and training organisers
 - marketing, communications and research agencies
 - freight and courier services
 - printers and distributors of direct marketing material
 - external business advisers (such as recruitment advisors, auditors and lawyers)

In the case of these contracted service providers, we may disclose personal information to the service provider and the service provider may in turn provide us with personal information collected from you in the course of providing the relevant products or services.

We take reasonable steps to ensure that our service providers are obliged to protect the privacy and security of personal information and use it only for the purpose for which it is disclosed.

7 Cross border disclosures

Unless we have your consent, or an exception under the APPs applies, we will only disclose your personal information to overseas recipients where we have taken reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to your personal information.

We may use cloud computing services or data storage located overseas in which case information may be stored, under our control, on computer servers located outside of Australia.

8 Storage, security and destruction of the information we hold

8.1 Storage

We hold personal information in both hard copy and electronic formats. Paper files are stored in secure cabinets onsite. They may also be archived in boxes and stored offsite in secure facilities.

8.2 Security

We take steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure. These steps include:

- website protection measures (such as encryption, firewalls and anti-virus software)
- access restrictions to our computer systems (such as login and password protection)
- restricted access to our office premises
- staff training and implementation of workplace policies and procedures that cover access, storage and security of information.

8.3 Notifiable Data Breaches

If you have knowledge of or become aware of any breach of security, please contact us immediately.

If there are reasonable grounds to believe there has been an eligible data breach, we will comply with all obligations and responsibilities under the Privacy Act, including any obligation to notify affected individuals as soon as practicable, and take effective remedial action to protect that individual's personal information.

Where practicable, we will notify an eligible data breach to affected individuals via SMS, email, post or telephone, if such channels of communication are available. Alternatively, where we do not have contact details of affected individuals, or where it is impracticable to notify all affected individuals, we will publish a notification of data breach statement on our website and take reasonable steps to publicise the contents of that statement.

8.4 Destruction

We take reasonable steps to destroy or permanently de-identify your personal information where it is no longer required, as soon as the law permits. However, some personal information must be maintained by us for certain periods in accordance with legislative and professional requirements.

9 Website

9.1 Website security

Our website does not enable visitors to post information to be accessed by others or to communicate with other visitors. While we strive to protect the personal information and privacy of users of our website, we cannot guarantee the security of any information that you disclose online and you disclose that information at your own risk.

9.2 Cookies

To improve your experience on our website, we may use 'cookies'. Cookies are an industry-standard and most major websites use them. A cookie is a small text file that our site may place on our computer as a tool to remember your preferences. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of the website.

9.3 Third party websites

For your convenience, our website may contain links to other third party websites, including websites of our partner service providers, which are not operated or controlled by us.

Whilst Ardoch's policy is to only partner with service providers that maintain reasonable privacy compliance standards, please be aware that we are not responsible for the privacy or security practices of any third party websites.

Third party websites should have their own privacy and security policies, which we encourage you to read before supplying any personal information to them.

10 Accessing and correcting personal information

You can request access to your personal information held by us, or request that it be corrected, by contacting us in writing by email or post using the details provided in Section 12 (Contact Us) of this Policy. Note that we will need to verify your identity before processing your request. In addition, if you wish to authorise us to disclose your

personal information to a third party (for instance, if you are an employee requesting for a letter of employment reference), you will have to submit your request and provide us with your authorisation in writing.

We will endeavour to respond to your request within a reasonable timeframe.

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). There is no fee for requesting access to personal information. However, we may charge a fee to cover our cost of verifying the application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, we will try to advise you of the likely costing in advance, and help to refine a request if required.

There may be instances where we cannot grant you access to the personal information we hold. For example, Victoria Police Guidelines prevent us from giving applicants/ employees/ volunteers their Police Certificate. We may also need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal.

If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, you may request that we amend it. We will consider if the information requires amendment, and we will take reasonable steps to correct your personal information if we are satisfied that it is inaccurate, out of date, incomplete, irrelevant or misleading. If we have provided your personal information to third parties we will also notify them of the correction if you ask us to do so, unless it is impracticable or unlawful.

If we do not agree that there are grounds for amendment, we will provide a full explanation as to why, and add a note to the personal information stating that you disagree with it.

11 Complaints

If you have a complaint about how Ardoch has collected or handled your personal information, please contact our Privacy Officer using the details provided under the heading 'Contact.'

We will endeavour to respond to your complaint within a reasonable timeframe (while complex cases may take longer to resolve, we will keep you updated on the progress of your complaint).

If you are unhappy with our response, you can refer your complaint to the Office of the Australian Information Commissioner or, in some instances, other regulatory bodies, such as the Victorian Privacy Commissioner.

The Office of the Australian Information Commissioner can be contacted by telephone on 1300 363 992. Full contact details for the Office of the Australian Information Commissioner can be found online at www.oaic.gov.au.

12 Contact Us

You may contact us in relation to this Privacy Policy or your personal information as follows:

Ardoch Privacy Officer

Tel: (03) 9537 2414
Fax: (03) 9537 3211
Address: Level 4 / 85 Queen Street, Melbourne VIC 3000
Email: info@ardoch.org.au

You can also help to protect the privacy of your personal information by contacting us on the above details as soon as possible if you become aware of any security breach, or if you have changed your contact details.