



Privacy Policy

1. Overview

We, CFC ANCOP Australia Ltd, are compliant with the Privacy Act in our collection and use of personal and sensitive information. In-country offices and CFC ANCOP Australia Ltd. (“ANCOP”) program partners are supported in applying this policy as a best practice guide when collecting, storing and using personal and sensitive information. Wherever there is a conflict between this policy and the laws of another country, the local law will prevail.

It is common for ANCOP to collect and store information to:

- provide effective services to members
- maintain membership and attendee lists
- manage donor and supporter lists
- coordinate and manage volunteers
- send newsletters or updates to donors, supporters and members
- account for activities or expenses, and
- provide supporting evidence when seeking grants or other funding.

2. Purpose

To achieve our purpose, we need to uphold the trust of ANCOP’s stakeholders by safeguarding Personal Information and complying with our privacy obligations.

This ANCOP Privacy Policy strengthens our corporate compliance by establishing minimum standards to manage privacy risk associated with the handling and protection of Personal Information. The Policy encourages a holistic approach to privacy risk management by interconnecting a wide range of policies, standards, and information management tools.

3. Scope

This policy applies to all volunteers, and supporters of CFC ANCOP Australia Ltd. This policy and the provisions under the Privacy Act 1988 do not apply to records or information collected prior to 21 December 2001.

The Privacy Act Principles apply only to information about individuals and only to information that falls into the category of personal, sensitive, confidential or health related.

Information about entities is excluded.

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4. Key Principles

The following key principles govern ANCOP's approach to privacy risk management.

- **Fair Information Handling**
 - We Collect Personal Information fairly, applying the 'Should We' Test appropriately. We provide notice and awareness of our Collection and Handling practices so our donors and volunteers and other stakeholders can make informed decisions about the Handling of their Personal Information.
 - Where required we give our donors and volunteers options and choice as to how some of the Personal Information Collected from them may be used.
 - Access is an essential element of fair Personal Information Handling practices. We give our donors and volunteers the right to find out what information we hold about them and update its accuracy and completeness if they believe it is wrong.
 - We provide donors and volunteers with avenues to raise Complaints with us about our Personal Information Handling practices.

- **Integrity and Security**
 - We take reasonable steps to ensure data integrity (validity and accuracy) and have measures, controls, and protocols in place to protect against loss, unauthorised Access, and Disclosure of Personal Information.
 - Management of privacy incidents and issues (including data breaches) is undertaken in line with the Risk Management Strategy – this includes rating, escalating, identifying the action(s) required, performance and recording, monitoring and reporting to regulators (as required) and closure.

- **Accountability**
 - Compliance expectations are set by a clear tone from the top which promotes a strong compliance culture.
 - We provide ANCOP volunteers with general and targeted training and communications to promote understanding of applicable privacy laws and obligations.

- **Continuous improvement**
 - We are committed to continuously improving our management of privacy risk. We assess the privacy risks and requirements of our activities i.e. donor services, fundraising events, systems, policies, processes
 - We undertake monitoring, reporting and review assurance activities to ensure privacy obligations are being met and any non-compliance is prevented or detected and corrected.
 - Continuous improvement occurs at any stage of privacy management but in particular after significant incidents and breaches and/or changes to laws and regulations.

- **Country specific requirements**
 - We comply with the privacy laws and regulations in the jurisdiction in which we operate. We identify and document applicable privacy Obligations.
 - Country specific requirements are set out in the appendices of each Group Privacy Standards as applicable.

5. Privacy Policy Commitments

All CFC ANCOP Australia Ltd. volunteers, partners and donors within Australia must follow this policy. For CFC ANCOP Australia Ltd. volunteers and partners in our in-country locations, this policy is considered best practice guidance. CFC ANCOP Australia Ltd. volunteers will work with partners to build their capacity to manage and store information in accordance with this policy.

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This policy applies to any individual from whom personal, sensitive or health information has been collected by CFC ANCOP Australia Ltd.

Why we collect information.

- We generally use your personal information to engage with you, process your request (e.g., gift, payment, registration, subscription, change of details) and tell you about the work that we do.
- We commit to only collecting information that is required for our activities and to always collect information fairly and transparently. This means that you will know what we collect, how we will use the information, and as far as practicable, will obtain information directly from you with your consent.
- Personal information will only be collected if required by law, or where reasonably necessary to enable CFC ANCOP Australia Ltd. to conduct activities or functions and for secondary purposes for which it would be reasonable to use or disclose personal information.
- Other purposes for which CFC Australia Ltd. may use personal information include:
 - Advocacy purposes when making a submission to Government
 - Developing or evaluating activities, services and programs
 - Engaging third parties to develop or evaluate activities, services and programs
 - Management of business including communications and social media strategy
 - Complying with legal obligations
 - Other purposes that may arise from time to time.
- We will always endeavour to obtain personal information directly from you. Where this is not possible, then where practicable, consent will be sought prior to collecting information from a third party.
- We will from time to time collect information from program partners concerning program participants. This information is collected for evaluation and reporting purposes and will be provided to CFC ANCOP Australia Ltd. in aggregated form. Where information is collected that could identify an individual participant, the person will be advised of the purpose for which it will be used and will have opportunity to grant or deny the request. The information will be destroyed at the request of the individual.
- For prospective volunteers, personal information may be sought by speaking with referees.
- We may collect personal information of volunteers or the purpose of engagement and administration of the engagement contract. This includes information such as name, address, date of birth, and other information. This information can only be used within the scope of the volunteer relationship for which it was collected.
- We will also collect information from our sponsors including names and addresses so that we are able to conduct background checks (such as counter-terror finance checks).
- We collect personal information of our supporters such as names, addresses and phone numbers, email addresses, bank account or credit card details and details of supporter preferences. This information allows us to manage supporter lists, send newsletters to supporters, and provide supporting evidence when seeking grants and other government funding.
- We may use personal information to send promotional or marketing material from time-to-time. Any such material will clearly indicate to the receiver how they may opt out of receiving such material in the future.
- Our website uses cookies and other digital identifiers that provide information on how the site is used and user analytics. Users can clear or disable cookies or digital identifiers from their device by changing security settings on their web browser. However, doing this may impact the functionality of the website.
- Personal information will be used for the purpose for which it was collected or for a related. Please always download the latest version from the website.

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6. Policy Requirements

6.1 Good privacy management

Privacy risk refers to the management, protection, and oversight of Personal Information. It is critical to delivering fair customer outcomes, maintaining reputation and enhancing our customer proposition. Effective management of privacy risk ensures:

- our donation services are designed to minimise interference with an Individuals' privacy;
- our Collection, Use and Disclosure of Personal Information is fair, reasonable, and aligned to the expectations of our donors and volunteers and communities; and
- we remain compliant with relevant privacy laws and regulations.

6.2 Privacy requirements

CFC ANCOP Collects, Uses, Discloses and Handles Personal Information, we must do in accordance with this Policy.

- **Collection of Personal Information**
We Collect the Personal Information we need for the Purposes described in our Privacy Statement or Notices. We provide notice and awareness via our Privacy Statement or Notices about the Personal Information we collect so that Individuals understand why we are Collecting their Personal Information, how we will use it, who it will be disclosed to and for what purpose, and where it will be transferred.
- **Use, Disclosure and Handling of Personal Information**
We Use, Disclose and Handle Personal Information in accordance with our Privacy Statement or Notices or as additionally authorised by law.

6.3 How we collect information

When we collect personal information, we make it clear:

- That the personal information is for CFC Australia Ltd.
- That we provide contact details for referring any question or concern
- How contact details were obtained
- If the information came from a third party, we will tell you from where we received the information
- The purpose of collecting the information and if there is any consequence for it not being provided
- Any person or entity to whom the information will be provided
- How the personal information can be corrected
- That any complaint can be directed to the President of CFC ANCOP Australia Ltd.

6.4 How we store information

- We are committed to securely storing personal information.
- Personal information is stored in a variety of forms including physical and electronic form. It may take the form of written documents such as Policies, records, visual data, receipts and financial records.
- Restrictions are placed on relevant documents to limit who has access to personal information. These restrictions include physical security such as locked cabinets and electronic security measures such as passwords, QR codes.
- We take the security of personal and sensitive information seriously. We protect information from misuse, interference, loss, unauthorised access, modification and disclosure. Information is categorised in accordance with the CFC ANCOP Australia Ltd. standards, which prescribe that personal and sensitive information has the highest standards of data security.
- Security measures include but are not limited to:
 - Physical access to our buildings is restricted
 - All personal and sensitive information is securely stored at all times
 - Virus scanning tools are frequently used

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- Databases are protected by secure user ID and passwords
- All supporter credit card details are encrypted
- Only authorised people will have access to personal information
- Email protocols are used (such as recipients can't see email addresses of other recipients)
- Confidentiality and privacy clauses are included in all contracts
- All cloud-based storage meets privacy requirements
- Third party providers are required to have security measures in place.

6.5 How we use information

- We do not use or disclose personal information that we have collected for any reason other than the primary purpose for which it was collected, unless:
 - You have provided consent for us to use it for another purpose
 - The purpose is closely related to the primary purpose, or
 - We are legally required or permitted to use the information. Please always download the latest version from the website or intranet.

We ask for consent from a supporter before publishing any information about their donation.

- Accessing, altering or deleting the information we collect.
 - You may be able to obtain a copy of personal information that we hold about you. To make a request to access this information please contact us in writing using info@cfcancop.org.au
 - There are circumstances under Australian privacy laws where access to the personal information cannot be granted. For example, when it would unreasonably affect someone else's privacy, or pose a serious threat to another person's life, health or safety.
 - If you notice any errors in your personal information, we will take all reasonable steps to correct it.
 - If you request access to information you may need to provide of identity before information is disclosed.
 - If we cannot give you access to personal information, we will tell you the reason why.
 - You can also request to access the personal information we hold about you, update or remove the information we have collected, or let us know of your preferences for how we communicate with you by contacting our info@cfcancop.org.au
 - If you have questions about this policy, suggestions how to improve or concerns about your data, please contact CFC ANCOP Australia Ltd. on info@cfcancop.org.au

6.6 Accuracy of Personal Information

We will take reasonable steps to ensure that the Personal Information Collected, Used, Disclosed and Handled by us is correct, accurate and up to date by having adequate systems, processes and controls in place including the ability for Individuals to Correct their Personal Information.

6.7 Security and Confidentiality

We classify Personal Information according to its risk and take steps to secure it from unauthorised Access, Disclosure, loss or modification. We only Access Personal Information when it is needed for a specific and legitimate business Purpose.

We take appropriate action to keep the Personal Information we hold and handle safe and secure. If the security of that information is compromised, we take action to mitigate the risk to the Individual. We manage and report privacy breaches in a timely manner to regulators as required by law and regulation. We have Policies and processes that require the Deletion or De-identification of Personal Information when we have no purpose for it.

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6.8 Donor Rights

Subject to exceptions in the law, we will provide Individuals with Access to their Personal Information and the ability to Correct their Personal Information. If Access cannot be provided or Correction made, we give reasons for this to the extent we are able to do so by law. We make it easy for Individuals to Complain if they are dissatisfied with our Handling of their Personal Information and we respond to Complaints in accordance with internal requirements.

7. Communication, Monitoring and Review

- All ANCOP leadership, members, partners and volunteers are made aware of this policy.
- ANCOP policies are available and accessible on our website <https://cfcancop.org.au/> .
- This policy is reviewed every three years using feedback from members, partners and program recipients so as to continuously improve on policy content and implementation.

8. References

CFC ANCOP Australia Ltd. Code of Conduct

CFC ANCOP Australia Ltd. Safeguarding Policy

9. Revision History

| Version | Approval Date | Summary of Changes |
|---------|---------------|--------------------|
| V1.0 | June 2024 | Original policy |

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