Privacy Policy V2

[Insert Logo]

[Insert address]

**PRIVACY STATEMENT**

This Privacy Policy is effective from 1st July 2014.

This Policy applies to [insert registered name of Church] [referred to as ‘our, ‘us’ or ‘we’].

This Policy outlines our obligation to manage and protect the personal information we hold about individuals according to National Privacy Principles (“NPPs”) contained in the Privacy Act 1988 (C’th) (“Privacy Act”).

'Personal information' is information or an opinion relating to an individual, which can be used to identify that individual. Some personal information, which we collect, is 'sensitive information'. Sensitive information may include information relating to a person's racial or ethnic origin, criminal record and may also include health information about an individual.

Personal Information available in the public domain may not qualify as personal information.

**1. Definitions:**

Individual or Person means;

* an employee or contractor,
* has or is attending services hosted by us,
* has visited us,
* has contacted or interacted with us,
* has completed forms provided by us,
* has attended an event hosted by us, and
* has requested our assistance.

**2. Commitment:**

1. the privacy of individuals is of utmost importance to the us as a matter of respect (Luke 6:31).
2. this Privacy Policy sets out how we manage personal information across our interaction with individuals,
3. we reserve the right to update this Privacy Policy from time to time,
4. the Privacy Policy published on our website [insert address of website] is the most current version, and
5. a copy of our Privacy Policy may be obtained by emailing [email address]

**3. Personal Information:**

Personal information may include;

1. Name.
2. Address/es.
3. Telephone Number/s.
4. Electronic address(es).
5. Date of birth.
6. Gender.
7. Church you attend.
8. Position held within the Church.
9. Other contact details.
10. Equivalent personal details of spouse and children.
11. Date of Baptism
12. Date of Dedication

**4. Website Cookies and Digital Services:**

Information may be generated and collected whenever a page is accessed on our website that records information such as the time, date and specific page. We collect such information for statistical and maintenance purposes to enable us to continually evaluate the effectiveness of our website.

Some parts of our websites may also use "cookies". A "cookie" is a small text file that is placed on your computer's hard drive by a web page server. Cookies store information about the use of our website and are used to identify new or previous visitors to the website and what pages have been accessed. Most web browsers are set to accept cookies, however this function can be disabled in most search engines if you wish. Please note that if you do disable this, not all functionality on our websites may be available to you.

We also may use Google Analytics features should as Google Remarketing, Google Display Network Impressions Reporting, Double Click Campaign Manager and Google Analytics Demographics and Interest Reporting on our website, which use both first party and third party cookies to record standard internet traffic information. We and some third parties, including Google, also use the information to optimise ad selection for groups of individuals based on age, gender, interests and past visits to our site. The cookies allow us and other third parties to evaluate your interactions with ad services on our site and serve targeted advertising on sites across the Internet. We may also have enabled Google Analytics for Display Advertising, which allows Google and other third parties to advertise to you on our site and across the Internet.

We also use along with third parties including Google, first party cookies such as Google Analytic cookies and third party cookies to report how our ad impressions, other uses of ad services, and interactions with these ad impressions and ad services are related to visits to our website. In addition, we may use data from Google's Interest-based advertising or third party audience data, such as age, gender, and interests, with Google Analytics to help us understand how user activity varies across these factors. By using Google Ads Settings (www.google.com/settings/ads), you can opt out of these features at any time and customise your Google Display Network Ads.

Importantly, we do not combine the anonymous information collected through Google Analytics with personally identifiable information.

In addition to Google Analytics, we may use a range of web analytics tools to help us analyse traffic on our website. In particular, these tools enable us to deliver cookies, count visits and understand usage and the effectiveness of our communications.

If you do not wish to receive any cookies you may set your browser to refuse cookies. However, this will mean that we will not be able to personalise your website each time you visit.

**5. Collection:**

Generally, we collect your personal information;

1. for legal requirements,
2. to fulfil our obligation as an employer,
3. for the national and state handbooks/directories and mobile applications,
4. as a means of communicating with you, and
5. for statistical analysis to assist manage and enhance our services.

**6. Direct Marketing:**

We collect personal information so that we can provide you with useful and relevant information about our products, services and events.

If you do not wish to receive direct marketing information from us you may opt-out by visiting our website [insert link to relevant section of website that enable persons to opt-out]

**7. Location-Based Services:**

To provide location-based services on our iPhone or Android applications, we and our third party hosting service/s may need to collect, use, and share location data, including the real-time geographic location of your mobile device.

The location data is used to provide and improve location-based features and services. The location data is collected anonymously in a form that does not personally identify you, however we may request you to provide personal information and link that information to your location data for the purpose of providing some of the location based features on the iPhone or Android applications.

**8. Storage and Protection:**

The NPPs require us to take all reasonable steps to protect the security of personal information. Our personnel are bound by a ‘Code of Ethics’ to respect the confidentiality of personal information and the privacy of individuals.

We take reasonable steps to protect personal information held from misuse and loss and from unauthorised access, modification or disclosure, for example by use of physical security and restricted access to electronic records.

We store personal information via a combination of;

1. cloud based data bases,
2. secure computer storage facilities, and
3. paper-based files and other records.

Additionally, we take reasonable steps to destroy or permanently de-identify personal information when we no longer need it.

**9. Disclosure:**

When we refer to “use” of personal information, we mean use within our Church, for the purposes outlined above. When we use the word “disclose”, we mean providing the information to persons outside our Church.

We may use and disclose personal information for the primary purposes for which it is collected, for reasonably expected secondary purposes, which are related to the primary purpose and in other circumstances authorised by the Privacy Act. Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless the Individual agrees otherwise, or where certain other limited circumstances apply (eg, where required by law).

We do not disclose personal information we collect to others for the purpose of allowing them to direct market their products and services.

We engage other people to perform services for us, which may involve that person handling personal information we hold. In these situations, we prohibit that person from using personal information about you except for the specific purpose for which we supply it.

We may use and disclose your personal information for a variety of purposes in connection with servicing you as a member or visitor. Some of these include;

1. to fulfil [our purpose](http://cccvat.com.au/about-us?tab=purpose),
2. processing and administering your membership,
3. providing you with the products and services you have requested,
4. to fulfil [our purpose](http://cccvat.com.au/about-us?tab=purpose) to other churches, associations or persons who may seek our services,
5. consultants we engage,
6. entities involved in a transfer or sale of all or part of our assets or business (including accounts and trade receivables),
7. regulatory authorities where required by law,
8. to comply with our moral and legal obligations such as reporting of child abuse,
9. to assist us manage and enhance our services,
10. disclosing your information for use by relevant parties in connection with assisting you with matters requiring the opinion of a person or third party provider expert in the required field, and
11. anyone the individual authorises us to disclose it to.

We will not send personal information to recipients outside of Australia without, obtaining the individual’s consent (in some cases this consent will be implied); or otherwise complying with the NPPs.

**10. Access:**

We take reasonable steps to ensure the personal information we collect, hold, use or disclose is accurate. If your personal details change you can update these by visiting our office or contacting us on [Telephone Number].

Subject to the exceptions outlined in the Privacy Act, individuals may gain access to their personal information. To access a copy please visit our office during business hours. We reserve the right to charge a fee for retrieving this information, in which case we will inform you of the fee in advance of providing the information. We will request you identify yourself prior to providing a copy of your personal information, such as siting your driver's licence etc. If we refuse to provide the information, we will provide reasons for the refusal and inform the individual of any exceptions relied upon under the Privacy Act.

**11. Complaints:**

If you wish to complain about our handling of your personal information, please send a written complaint to us. We undertake to promptly acknowledge and investigate any complaint about the way we manage personal information.

If you are dissatisfied with the outcome of our investigation, you may take your complaint to the Office of the Australian Information Commissioner (OAIC). For information in making a complaint to the OAIC, please visit the OAIC's website

<http://www.oaic.gov,au/privacy.making-a-privacy-complaint>

or phone 1300 363 992.

**12. Rights:**

If an individual does not have the capacity to understand and agree to these terms, we will require a parent or guardian to provide assurances.