

**Uniting Church in Australia (Synod of Victoria & Tasmania), The Uniting Church in Australia Property Trust (Victoria) and The Uniting Church in Australia Property Trust (Tas.)**

**Privacy Policy**

Date: December 2023

**1. About this policy and our commitment to your privacy**

- 1.1 This Privacy Policy (**Policy**) applies to the Uniting Church in Australia, Synod of Victoria & Tasmania (ABN 39 703 442 583), The Uniting Church in Australia Property Trust (Victoria) (ABN 39 703 442 583), The Uniting Church in Australia Property Trust (Tas.) (ABN 88 774 033 774) and covers and presbyteries and congregations within the Synod's bounds, and any relevant Synod institution within the Synod's bounds that does not have its own privacy policy (**UCA, we, our or us**). UCA aims to further the Uniting Church in Australia's purposes, namely the advancement of religion and public benefit, including through the oversight of property and operations.
- 1.2 We recognise the importance of protecting your privacy and your rights in relation to your personal information. This Policy outlines the types of personal information that we usually collect, the purposes for which we collect it, to whom we disclose it, how we hold and keep it secure, and your rights in relation to your personal information, including how to complain and how we deal with complaints.
- 1.3 We respect your rights and will handle your personal information in accordance with this Policy and applicable law, including the *Privacy Act 1988* (Cth) and applicable state-based health records legislation.
- 1.4 This Policy does not apply to:
- (a) the personal information of our employees; or
  - (b) the handling of personal information by our related entities.
- 1.5 We may update this Privacy Policy from time to time by publishing changes to it on our website.

**2. What is your personal information?**

- 2.1 In this Policy, **personal information** means any information or opinion about an identified individual or an individual who is reasonably identifiable, whether true or not. In general terms, personal information is any information that can be used to personally identify you, either on its own (eg your name) or when combined with other information reasonably available to us (eg, we cannot identify you from your date of birth alone, however, as we can link this to your name in our databases, it is your personal information).
- 2.2 The types of personal information we collect about you are listed in the next section of this Policy.
- 2.3 Some of the personal information we may need to collect about you may include **sensitive information**, which is a special category of personal information that is given extra protection under privacy laws. Sensitive information includes information about your health, 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 orientation or practices, criminal history, genetic information, biometric templates and biometric information (eg features of your face).

**3. What personal information do we collect and hold?**

- 3.1 The types of personal information we collect and hold about you depends on the dealings you have with us. This generally includes your full name and contact details (street address, email address and phone number) and may also include the following, depending on the dealings you have with us:
- (a) **congregational members or visitors:**
    - (i) age and birth date;
  - (b) **individuals who receive services from us:**

- (i) age, birth date, details of the services that we have provided to you or which you have enquired about, and any additional information necessary to deliver those services and respond to your enquiries;
- (c) **donors**
  - (i) donation/offering amount;
- (d) **volunteers and job applicants:**
  - (i) age, date of birth;
  - (ii) volunteer position and location,
  - (iii) occupation, any information in your resume,
  - (iv) criminal history check and working with children/vulnerable people check;
  - (v) for volunteers who receive reimbursements or payments, their bank account details;
- (e) **ministers on placement:**
  - (i) age, date of birth, tax file number, working with children/vulnerable people check, criminal history check and copies of your identity documents (eg driver's licence and passport);
- (f) **tenants (residential or commercial):**
  - (i) bank account details, financial statements, credit checks;
- (g) **contractors or individuals who provide services to us:**
  - (i) bank account details, working with children check and criminal history check;
- (h) **online training participants:**
  - (i) congregation name (if any), training completion status.

3.2 We may also collect:

- (a) footage of you via CCTV surveillance if you visit one of our premises;
- (b) any additional information relating to you that you provide to us directly through our websites or indirectly through use of our websites or online presence, through our representatives or otherwise;
- (c) information you provide to us through our activities and services, surveys or visits by our representatives from time to time; and
- (d) sensitive information about you (including health information) where it is reasonably necessary for one or more of our functions or activities.

**4. How do we collect your personal information?**

4.1 We may collect personal information from or about you in different ways, including:

- (a) through your access and use of our website;
- (b) during conversations and via correspondence between you and our representatives;
- (c) when you complete an application or purchase order;
- (d) when you register for our conferences, events or courses and when you participate in our activities;

- (e) when you complete an online training module using the learning management system, such as child safety training;
  - (f) when you complete our forms for the provision of services or to volunteer your services and assistance to us;
  - (g) when you complete a survey or make a donation/offering;
  - (h) if you complete a form when you visit one of our church buildings;
  - (i) from our related entities for the purposes of providing services to you;
  - (j) from third parties such as credit reporting agencies to assess your financial suitability for a tenancy, law enforcement agencies and other government entities and specialist agencies that assist us in achieving our objectives (eg when conducting a criminal record check or when verifying a working with children check); and
  - (k) through CCTV surveillance at our premises.
- 4.2 If you apply for a job, contract or volunteer position with us, we may also collect personal information about you from third parties and publicly available sources, including recruiters and your referees.

## **5. Can you remain anonymous?**

- 5.1 Where practicable and lawful, you may interact with us without identifying yourself (including by using a pseudonym). For example, if you contact us with a general question we will not record your name unless we need it to adequately handle your question. In addition, you can visit our website without providing any personal information.
- 5.2 However, if you choose not to identify yourself, we may be limited in our ability to respond to your query or provide you with the services or assistance you require.

## **6. Cookies**

- 6.1 When you visit our website, we may also use 'cookies' or other similar tracking technologies that help us track your website usage and remember your preferences. Cookies are small files that store information on your computer, mobile phone or other device. They enable us to recognise you or your device(s) across different websites, services and/or browsing sessions, for example, so that we can greet you each time you visit our website without bothering you with a request to register. You can disable cookies through your internet browser but our website may not work as intended for you if you do so.
- 6.2 Whilst we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and date of your visit, search engine referrals, and the internet protocol address assigned to your computer.

## **7. For what purposes do we collect, hold, use and disclose your personal information?**

- 7.1 We collect, hold, use and disclose your personal information for the following purposes (depending on the dealings you have with us):
- (a) communicating with you, including answering enquiries and providing information or advice about existing and new services and processing and responding to any complaint or enquiry made by you;
  - (b) providing our services and activities conducting service processing functions, which may include providing personal information to our various organisations, contractors, service providers or other third parties;
  - (c) registering you for and organising our events, conferences, courses and activities;
  - (d) administering your donation;
  - (e) managing your volunteer involvement/placement with us;

- (f) assessing your job application;
- (g) appointing you as a Church Minister in accordance with Uniting Church Regulations;
- (h) administering your lease, conducting reference and credit checks and assessing your financial suitability for a tenancy;
- (i) obtaining services from you as our contractor or other individual who provide services to us;
- (j) ensuring 'safe church practices' are complied with;
- (k) providing you with access to protected areas of our website;
- (l) assessing the performance of our website and improving the operation of our website;
- (m) for our administrative, marketing (including direct marketing), planning, product or service development, quality control and research purposes, as well as those of our various organisations, contractors or service providers;
- (n) updating your personal information held by us or our related entities, contractors or service providers;
- (o) direct promotion of services and keeping you informed of new developments we believe may be of interest to you;
- (p) dealing with third parties where we have retained those third parties to assist us to undertake our activities and provide the services you have requested, such as religious education instructors, catering and event coordinators, promotions companies, transport providers, health care providers, website hosts and IT consultants, and our professional advisers such as consultants, lawyers and accountants;
- (q) complying with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country (or political sub-division of a country).

## **8. To whom do we disclose your personal information?**

8.1 We may disclose your personal information to the following:

- (a) our volunteers, officers and office holders, ministers of religion and other religious leaders, various related entities (including other Synods), contractors or service providers for the purposes of our operations or operation of our website, fulfilling requests by you, and to otherwise provide services to you including, without limitation, web hosting providers, IT systems administrators, mailing houses, couriers, payment processors, data entry service providers, electronic network administrators, debt collectors, and professional advisors such as accountants, solicitors, business advisors and consultants;
- (b) suppliers and other third parties with whom we have commercial relationships, for operations, marketing, and related purposes;
- (c) students studying theology and/or related disciplines;
- (d) other organisations with your consent;
- (e) our related entities for the purposes of providing services to you.

8.2 We may also combine or share any information that we collect from you with information collected by any of our related organisations (within Australia).

## **9. Do we disclose your personal information overseas?**

9.1 Some of the organisations to whom we disclose your personal information (see section 8 of this Policy) may be located overseas. In particular, your personal information will be disclosed to overseas recipients where necessary in the course of some processes, such as during the recruitment of volunteers for overseas placements.

9.2 The countries in which these recipients may be located will vary with the circumstances of the volunteer placement and application but may include: China, Cook Islands, Fiji, India, Indonesia, Kiribati, Nauru, New Caledonia, New Zealand, Niue, Philippines, PNG, Samoa, Solomon Islands, South Sudan, Sri Lanka, Switzerland, Thailand, Taiwan, Timor Leste, Vanuatu, Tuvalu, Tonga, United Kingdom, United States of America, Zambia or Zimbabwe.

9.3 In general, we will not disclose personal information overseas unless we take reasonable steps to ensure the recipient will protect your personal information and handle it in accordance with the Australian Privacy Principles. This may include entering into contractual arrangements with the recipient or ensuring they are already subject to laws that are equivalent to the Australian Privacy Principles that you can enforce.

## **10. How do we use your personal information for marketing?**

10.1 We may, with consent where required, use your personal information to identify a service that you may be interested in and to contact you from time to time (whether by email, SMS or mail) to tell you about services and news that we believe may be of interest to you.

10.2 You can opt-out of receiving direct marketing communications from us at any time by contacting our Privacy Officer using the contact information in section 14 of this Policy.

## **11. How do we hold your personal information and keep it secure?**

11.1 We store your personal information in hard copy and/or electronically. Electronic information is stored with a third-party storage provider. We take reasonable steps to protect your personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure.

11.2 We only keep your personal information for as long as it is required for a purpose for which the information may be used or disclosed under the *Privacy Act 1988* (Cth) or as otherwise required by applicable law or authority. If we no longer need to hold your personal information for any reason and are no longer required by law to keep it, we will take reasonable steps to de-identify or destroy that information. These steps may vary depending on the nature of the information, the way it was collected, and how it is stored.

## **12. How can you access and correct your personal information?**

### *Correction requests*

12.1 You may request to correct your personal information at any time by contacting our Privacy Officer using the contact information in section 14 of this Policy. We may need to verify your identity before responding to your request. Subject to any applicable exceptions, we will take reasonable steps to correct your personal information within a reasonable time. If we decide to refuse your request, in most circumstances we will tell you why in writing and how to complain.

12.2 We will not charge you to correct your personal information.

### *Access requests*

12.3 You may request access to your personal information at any time by contacting our Privacy Officer using the contact information set out in section 14 of this Policy. We may need to verify your identity before responding to your request. Subject to any applicable exceptions or requirements, we will provide you with access to the personal information you request within a reasonable time. If we decide to refuse your request, in most circumstances we will tell you why in writing and how to complain.

12.4 We may charge you a fee to cover our reasonable administrative and other costs (such as photocopying or time spent on redaction) in providing the information to you. If we estimate those fees to be greater than \$100, we will provide you with an estimate of fees and seek your agreement to those fees prior to commencing work on providing the information.

## **13. How can you make a privacy complaint?**

- 13.1 If you consider that we have breached your privacy, or you are not happy with the way we have handled your personal information, please contact our Privacy Officer using the contact information in section 14 of this Policy.
- 13.2 We will respond to you within a reasonable period of time to acknowledge your complaint and inform you of the next steps we will take in dealing with your complaint.
- 13.3 If you are not satisfied with our response, you may complain to the Office of the Australian Information Commissioner (**OAIC**) via the OAIC website, [www.oaic.gov.au](http://www.oaic.gov.au) If there are other government agencies we consider you can complain to based on the nature of your complaint, we will inform you of this at the time we respond to your complaint.

**14. How can you contact us?**

If you have a question or comment regarding this Policy or wish to make a complaint or exercise your privacy rights, please contact our Privacy Officer:

Level 2, 130 Lonsdale St, Melbourne VIC 3000  
Email: [privacyofficer@victas.uca.org.au](mailto:privacyofficer@victas.uca.org.au)