



Privacy Policy

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Record of Policy Review:

<i>Date Policy was Issued</i>	<i>Date of Review</i>	<i>Reason for Review</i>	<i>Lead Reviewer</i>	<i>Additional Comments</i>
Dec. 2016	March 2017	Update for Indue compliance	CCFS Executive	
	Feb 2019	Annual review & update	CCFS Executive	Noted AFCA membership
	July 2019	Inclusion of the Notifiable Data Breach Scheme obligations	CCFS Executive	
	Dec 2021	Scheduled review	CCFS Executive	

1. Purpose and Scope

Churches of Christ Financial Services (CCFS) is committed to protecting the privacy and confidentiality of clients, staff, Board members, students, volunteers and stakeholders in the way information is collected, stored and used.

This policy provides guidance on CCFS's legal obligations and ethical expectations in relation to privacy and confidentiality.

CCFS is bound by the Australian Privacy Principles (APP) under the Privacy Act 1988 (Cth) (Privacy Act).

This Policy outlines how we deal with your personal information as to our legal obligations and rights to that information. If we agree with you to use or disclose any or your personal information in ways which differ to those stated in this Policy, the provisions of that agreement will prevail to the extent of any inconsistency.

2. Definitions

Privacy provisions of the Privacy Act 1988 govern the collection, protection and disclosure of personal information provided to CCFS by clients, Board members, staff, volunteers, students and stakeholders.

Confidentiality applies to the relationship of confidence. Confidentiality ensures that information is accessible only to those authorised to have access, and is protected throughout its lifecycle. Confidential information may be marked as such or deemed confidential by its nature, e.g. it is information that is not available in the public domain.

Consent means voluntary agreement to some act, practice or purpose. Consent has two elements: knowledge of the matter agreed to and voluntary agreement.

Individual means any person such as a client, staff member, Board member, volunteer, student, contractor or a member of the public.

Organisational information includes publicly available, and some confidential, information about organisations. Organisational information is not covered in the Privacy Act (1988) but some organisational information may be deemed confidential.

Personal information means information or an opinion (including information or an opinion forming part of a database) about an individual (Office of the Federal Privacy Commissioner, 2001). It may include information such as names, addresses, bank

account details. The use of personal information is guided by the Federal Privacy Act (1988).

The public domain in relation to confidentiality is “common knowledge,” i.e. information that can be accessed by the public.

3. Principles

CCFS is committed to ensuring that information is used in an ethical and responsible manner.

This Policy sets out how we manage your information. It sets out:

- What information we collect and hold
- How we collect and hold information
- Why we collect, hold, use and disclose your information
- How you can access your information
- How you can correct your information
- How you can complain about the handling of your personal information.

4. Policy Detail

The privacy of personal information is defined by legislation (Privacy Act 1988). At all times, CCFS acts in accordance with these legal requirements which are underpinned by the policy statements 4.1- 9.

4.1 Information we collect and hold

We only ask for personal information relevant to our business relationship with a customer. When you apply for one of our products or services, we may request:

- identifying information, like your name, address and other contact details and your date of birth
- your church and agency
- your tax file number, and
- your reasons for applying for a product or service

4.2 How we collect your Information

Wherever possible, we will collect personal information directly from you. This information will generally come from what you provide in your application for one of our products or services and supporting documentation.

4.3 We collect and use your personal information for several purposes, such as:

- Entities that verify identity
- Lawyers, conveyancers, accountants, brokers and agents representing you
- Contractors for statement printing and mail out, card and cheque production, market research or direct marketing.

- Executing your instructions.
- Charging and billing.
- We will also disclose your information to law enforcement and government agencies as required by law or to assist with their enforcement activities.
- Direct marketing
- Maintaining and developing our business systems and management processes.

4.4 How we hold your information

We hold your information in our banking system and on site filing system. We take all reasonable steps to ensure that your personal held is protected from:

- Misuse, interference and loss
- Unauthorised access, disclosure or modification.

We ask you to keep your passwords and personal identification numbers safe in accordance with our suggestions.

When we no longer require personal information (including when we are no longer required to keep records relating to you), we take reasonable steps to ensure that it is destroyed or deidentified.

4.5 Electronic Communication

4.5.1 Visiting our Website

Anytime you access an unsecured part of our website, (that is, a public page that does not require you to log on), we will collect information about your visit, such as:

- The time and date of visit;
- Any information or documentation that you download;
- Your browser type; and
- Internet protocol details of the device used to access the site.

4.5.2 Cookies

A "cookie" is a small text file which is placed on your internet browser and which we may access each time you visit our website. When you visit the secured pages of our website (i.e. pages that you must provide login details to access) we use cookies for security and personalisation purposes.

When you visit the unsecured pages of our website (i.e. public pages that you can access without providing login details) we use cookies to obtain information about how our website is being used.

You may change the settings on your browser to reject cookies; however, doing so might prevent you from accessing the secured pages of our website.

4.5.3 Email

When we receive emails, we will retain the content of the email and our response to you where we consider it necessary to do so.

Your email address will only be used or disclosed for the purpose for which it was provided. It will not be added to any mailing list or used for any other purpose without your consent.

4.5.4 Security

We use up-to-date security measures on our website to protect your personal information. Any data containing personal, credit or related information which we transmit via the internet is encrypted.

CCFS is to comply with the Privacy Act 1988 and is committed to complying with the Notifiable Data Breaches Scheme (NDB) established by the Privacy Amendment (Notifiable Data Breaches) Act 2017.

The NDB requires that where a data breach is likely to result in serious harm to any individuals to whom the information relates, we are required to notify those individuals and the Office of the Australian Information Commissioner (OAIC)

4.6 Accuracy

We take reasonable steps to make sure that the personal information that we collect, use or disclose is accurate, complete and up-to-date. However, if you believe your information is incorrect, incomplete or not current, you can request that we update this information by contacting CCFS.

4.7 Marketing

We may use your personal information, including your contact details, to provide you with information about products and services.

We will consider that you consent to this, unless you opt out. You may opt out at any time if you no longer wish to receive marketing information through a channel, like email. To do so, you will need to request that we no longer send marketing materials (except those received via statements) to you.

You can make this request by contacting CCFS.

4.8 Changes to the Privacy Policy

We may make changes to this Privacy Policy from time to time (without notice to you) that are necessary for our business requirements or the law. Our current Privacy Policy is available on our website.

4.9 Questions and complaints

If you have any questions, concerns or complaints about this Policy, or the handling of your personal information, please contacting CCFS.

You can also contact CCFS if you believe that the Privacy of your personal information has been compromised or is not adequately protected.

Once a complaint has been lodged, CCFS will respond to you as soon as possible. We will aim to deal with your complaint at the time of your complaint. If you are not satisfied with the response you receive, please let us know and we will investigate further and respond to you.

If you still are not satisfied, you can contact external bodies that deal with privacy complaints. These are the Australian Financial Complaints Authority (see below) which is our external dispute resolution scheme and the Federal Privacy Commissioner (see below).

Australian Financial Complaints Authority

GPO Box 3, Melbourne Vic 3001

Telephone: 1300 56 55 62

Website: www.afca.org.au

Federal Privacy Commissioner

Post: GPO Box 5218 Sydney NSW 2001

Telephone: 1300 363 992

Website: www.oaic.gov.au

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