

## Policy Document

# PRIVACY



### Introduction

Christian Youth Centre Inc. (Camp Clayton) believes that your privacy is an important right that you have as an individual and as an organisation. Camp Clayton is committed to protecting your privacy when collecting and handling your personal information. This Privacy Policy sets out, generally, how your personal information is managed.

### Scope

This policy applies to all employees, contractors, subcontractors, volunteers, guests and visitors of Camp Clayton.

### Collection of Personal Information

Camp Clayton only collects personal information necessary to carry out its functions and activities such as:

- To enable you and others to obtain the benefit of, and participate in, the services and facilities we provide
- To provide you with helpful information
- To provide you with information you have requested from us
- To enable Camp Clayton to respond to feedback forwarded to us via our website
- To enable us to determine the types of services users desire
- To provide you with information about matters Camp Clayton considers may be of interest to you

The types of personal information that we collect generally includes names, telephone numbers, mailing addresses, email addresses, facsimile numbers, and other contact details.

If it is reasonable and practicable to do so, Camp Clayton will collect personal information directly from you. We may collect personal information when you register on our website and when you submit queries and other forms on our website. Information is collected from you when you use our website. How you use our website (and the services we provide by means of it) will determine what information we collect from you.

We will collect personal information from you or about you when you use our website by doing things such as completing an online form or providing information to us by email.

If you enter our website our web server creates a text file, which it attaches to your computer, enabling a unique identification to be given to your computer. Cookies enable our systems to track your clicks as you browse our website and move between pages on our site. We do not use cookies to retrieve or store personal information about you from your computer. Most Internet browsers are pre-set to accept cookies. If you prefer not to receive cookies, you can adjust your Internet browser to disable or to warn you when cookies are used. By disabling cookies, you may not be able to participate in some of the online features offered by Camp Clayton. Camp Clayton, or our service provider, may take a record of your visit to our website and log information from your browser including your IP address, the date and time of your visit, the pages accessed, documents downloaded, top level domain name (for example .com, .gov or .au) and the type of browser used. The information collected

is not linked back to individual users except, in the unlikely event of an investigation, where a law enforcement agency exercises a right to inspect the service provider's logs. In addition, when you use our online search facility we collect information about the information for which you search. Again, that information collected is not linked back to the individual.

Camp Clayton will only collect personal information by lawful and fair means and not in an unreasonably intrusive way.

### **Sensitive Information**

Camp Clayton will not collect sensitive information unless consent has been given and the information is reasonably necessary to enable Camp Clayton to fulfil its functions. Information that is regarded as sensitive under the Privacy Act 1988 are: racial or ethnic origins, political opinions and memberships, religious beliefs or affiliations, philosophical beliefs, professional or trade associations or memberships, sexual preferences or practices or criminal record. Sensitive information also includes health information and genetic information about an individual that is not otherwise health information.

### **Use and Disclosure of Personal Information**

We only use or disclose personal information we collect about you in compliance with the Privacy Act, 1988.

We will use and disclose your personal information for the purpose of our business, including those purposes outlined under the heading "Collection of Personal Information" above, or other purposes related to that purpose such as marketing and where you consent to such disclosure. Personal information that you submit to us may be used and disclosed by us to the extent authorised by you or as reasonably required in connection with the operation of our business and in compliance with applicable laws.

Personal information such as your name, mailing address, email address, account or phone number will only be disclosed where we are required by law to disclose that information or on the good faith belief that such action is necessary to:

1. Enable you and others to obtain the benefit of, and participate in, the services and facilities we provide;
2. Conform to legal requirements; and
3. Protect and defend our rights.

We may disclose your personal information to third party organisations such as contractors who assist us in operation of our business to enable those contractors to perform functions on our behalf. We may also disclose your personal information to organisations who provide services and benefits to persons with whom we do business to enable those persons to effectively carry out those services and provide those benefits. Where information is disclosed to such third parties we will seek to prohibit the third party from using your personal information except for the specific purpose for which we supply it.

By providing personal information to us you consent to the disclosures and uses set out in this Policy.

## **Trans-border Flow of Personal Information**

Personal Information may be transferred overseas. This will be done in circumstances where:

- The overseas country has effective minimum standards similar to the Australian Privacy Principles; or
- Consent has been given/requested by the client to the transfer;
- It is impracticable to obtain the client's consent and it is likely that consent would be given; or
- It has been contracted with the recipient that they will not treat information in a manner inconsistent with the Australian Privacy Principles.

## **Receiving Email and Other Correspondence (Opting-Out)**

If you provide an email address to us, Camp Clayton may send emails to you.

Camp Clayton's website provides users with the opportunity to opt-out of receiving communications from us.

If a user has already granted permission to receive email correspondence a user may opt-out of receiving email correspondence by resending the relevant email to us and typing, "remove" in the subject heading.

We may also use any postal address supplied to us to provide periodic mailings with information on events, services and products. If a user does not wish to receive such mailing, we should be notified appropriately.

Where we receive a request from a user with respect to privacy options, we will use our reasonable efforts to delete the relevant personal information from our records. However, we cannot guarantee that all information will be deleted, as there is a possibility that a residual copy of the information will be maintained on a back-up system.

## **Anonymity**

Wherever it is lawful and practicable to do so, Camp Clayton will provide you with the option of not identifying yourself when dealing with us. However, we will require your personal information to enable you and others to obtain the benefit of, and participate in, the services and facilities we provide and, where necessary, to verify your identity.

Once you disclose your identify to us you cease to be anonymous.

## **Quality and Security of your Personal Information**

We will take reasonable steps to seek to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure by a range of security measures.

Only authorised employees are permitted to access your personal information. All employees must comply with our Privacy Policy.

We will take reasonable steps to implement and maintain security precautions and endeavour to prevent unauthorised access to, and disclosure of, information you provide to us. However, as no data transmission over the Internet is 100% secure, Camp Clayton is unable to guarantee that unauthorised access to submitted information will not occur, either during transmission of that information or after we receive that information.

Camp Clayton is subject and bound to the Australian Privacy Principles in the *Notifiable Data Breach Scheme*, under the Commonwealth Privacy Act (effective 22<sup>nd</sup> February 2018). The Privacy Officer is responsible for reporting eligible data breaches to the OAIC (Office of the Australian Information Commissioner) and to any individual affected by the breach according to the definition of *'eligible data breach'*.

### **Links to other Sites**

Camp Clayton Web site may contain links to Web sites of other companies and organisations. Camp Clayton is not responsible for the privacy policies, practices or content of such Web sites.

### **Access, Correction or Complaint**

If you wish to access personal information about you held by Camp Clayton, alter it or raise a concern or complaint in respect of it, please email your request to [admin@campclayton.org.au](mailto:admin@campclayton.org.au).

Alternatively post your request to PO Box 3184, Ulverstone, TAS7315, marked for the attention of 'The Privacy Officer'.

We will provide you with access to the personal information held upon receiving a request from you except where we refuse access to that information in conformity with the Act. If we deny your request for access to personal information, we will provide you with the reasons for that denial. We may recover an amount from you to cover our reasonable costs of providing you with access to that personal information.

### **Acknowledgement**

This policy is based on Christian Youth Camps Ltd Privacy Policy 2018.

-----END POLICY-----