POLICY G011: PRIVACY POLICY

Responsible person:	CEO	Version:	2.1
Approved by Board of Directors on:	27 February 2019	Scheduled review date:	April 2027

PREAMBLE

This policy was written by So They Can (Australian Entity) for use across all So They Can offices. So They Can operates five offices registered in each of Australia, Kenya, Tanzania, New Zealand and USA, which are part of the So They Can Global Alliance. In this policy, 'CEO' means CEO of So They Can (Australian Entity). Unless specified otherwise the 'Board' refers to the board of So They Can (Australian Entity). This policy is intended for all So They Can staff, Board members and volunteers, in all 5 So They Can offices. So They Can procedures are consistent with So They Can policies.

INTRODUCTION

So They Can is committed to safeguarding your personal information in accordance with the Australian Privacy Principles contained in the Privacy Act 1988.
This Policy contains information about how So They Can collects, uses, discloses and stores personal information, including sensitive information, and how individuals may access and correct personal information that we hold.

DEFINITIONS

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- whether the information or opinion is true or not; and
- whether or not the information or opinion is recorded in a material form.

POLICY

WHAT INFORMATION WE COLLECT

So They Can may collect personal information from people who are connected to our operations and activities – including employees, donors, research study participants, beneficiaries, participants in fundraising campaigns, members, suppliers, volunteers and service providers.
The information that So They Can collects and stores typically includes:

- Your name, address, phone numbers, email addresses (contact information)
- Your date of birth, gender, income and occupation
- Your employer's details, if you participate in workplace giving
- Your bank account or credit card details
- A history of your donations, emails, letters and other interactions with So They Can

HOW DO WE COLLECT PERSONAL INFORMATION

Where possible, So They Can will collect your personal information directly from you. This may be by direct contact in person or by email, on the telephone, or online. We may collect personal information from

another source including a third party where you consent, where it is unreasonable or impractical to collect the information only from you or where we are required or authorised to do so by law.

So They Can also collects information from third parties who fundraise for us, or organise workplace giving. If someone makes a donation on your behalf, and asks that you receive information about their gift, we will collect the information they provide about you.

HOW WE USE INFORMATION

Your personal information will only be used and disclosed for the purpose for which it was collected, or otherwise in accordance with the Privacy Act. So They Can may collect your personal information for a number of purposes, including:

- Fundraising:
    a) to process or confirm your donation and issue a receipt;
    b) to send you information about how your donation was used;
    c) to update you if we have information that may affect your sponsorship;
    d) to respond to your questions, comments, compliments or complaints;
    e) to inform you about new opportunities to support our work;
    f) to analyse donor activity in order to improve our effectiveness.
- Volunteering and other support: to enable you to assist us with volunteering, fundraising, raising awareness and other activities where we seek assistance
- Marketing: to communicate with you about our projects, achievements and outcomes, upcoming event and past events
- Other issues: communicating with you in relation to our operations, activities and objectives, to verify your identity, to improve and evaluate our programs and services, and to comply with relevant laws.

Where So They Can collect your personal information for a specific purpose not outlined above, we will provide you with a collection notice which explains the primary purpose and any related secondary purposes for which we are collecting your personal information.

WHEN WE DISCLOSE INFORMATION

So They Can will not disclose your personal information unless one or more of the following applies:

- you have consented to disclosure (to credit reference agencies, vetting reference agencies, for secondary purpose)
- it is required or authorised by government bodies and law enforcement agencies

COOKIES, OUR WEBSITE AND YOUR PRIVACY

In order to understand how people arrive at and interact with the So They Can website and related social media platforms and how they use it, we rely on cookies provided by third parties. This enables us to assess the effectiveness of our online advertisements. Cookies do not reveal personal information, such as your name, address, phone numbers or email address. You can adjust your browser to disable cookies, but this may restrict your ability to access certain areas of our website.

HOW WE PROTECT INFORMATION

So They Can takes steps to protect the personal information we hold against misuse, interference and loss; and from unauthorised access, modification or disclosure.

We use security encrypted response forms to protect the personal and financial information you provide us over the Internet. To confirm that your browser supports our encryption system, check for a security icon (usually a padlock) at the bottom of your screen.
We have secured our in-house IT system with a firewall and anti-virus scanners. We also ensure that all personal information is removed from computers before disposal or sale.
Hard copy files are kept in secure cabinets and staff are trained in our privacy procedures. Only authorised staff have access to your information and only when it is required.

HOW YOU CAN PROTECT YOUR INFORMATION

If you sponsor a child or adult through So They Can sponsorship program, please ensure you follow So They Can's guidelines on communicating with, and visiting, the sponsored person/s, to ensure your privacy is maintained. All communication between you and the person you sponsor must go through So They Can office in Australia or New Zealand. This includes but is not limited to post, electronic communication, on-line and post and face-to-face visits.

HOW LONG WE KEEP YOUR INFORMATION

So They Can will destroy or de-identify your personal information when we no longer need it for the purpose for which it was collected, unless the law requires otherwise.

GAINING ACCESS TO YOUR PERSONAL INFORMATION

You are entitled to access all of your personal information that So They Can has collected and stored. To request access, please contact us using the contact details below.

OPTING OUT OF FUTURE COMMUNICATION

If you don't want to receive communications or marketing materials, please contact us using the contact details below.

MANDATORY DATA BREACH NOTIFICATIONS

According to the Privacy Act in Australia So They Can is required to notify you and the Australian Information Commissioner if we suspect that a data breach (relating to your personal and / or sensitive information) has occurred and there is real risk of serious harm to you as a result of the breach.

COMPLAINTS

If you have any queries or would like to make a complaint relating to our Privacy Policy or the manner in which we handle your personal information, please contact us on +61 2 9966 5225, email us at info@sotheycan.org or write to us at So They Can, PO Box 422, Crows Nest NSW 1585.

We endeavour to respond to complaints and queries within fourteen days of their receipt. If you are dissatisfied with our response, you may lodge a complaint with the Office of the Australian Information

Commissioner (OAIC) by writing to the OAIC at GPO Box 5218, Sydney NSW 2001. For further information about the OAIC, please visit www.oaic.gov.au.

RELATED DOCUMENTS

- So They Can Policy and Manual Register