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# **CRCST** Privacy Policy

The Network of Christian Reformed Churches in Southern Tasmania (the Network) respects a person's right to privacy. This policy was developed around the <u>Australian Privacy Principles</u> (APP), as the principles set clear standards for the collection, access, storage and use of personal information. We will always ensure that all personal information, no matter how or where it is obtained, is handled sensitively, securely.

Personal information held by the Network will not be released to any person outside the Network unless the Network is required to do so by law. All reasonable precautions will be taken to ensure personal information collected and used is accurate, complete and up to date. All reasonable precautions are taken to ensure information held by the Network is not subject to loss, misuse or unauthorised access or alteration.

#### Definitions

*The Network* – is those churches who form part of the Network of Christian Reformed Churches of Southern Tasmania Inc., as defined within the Constitution of that Incorporated Association. As of September 2018, those churches are Bay Christian Church, Kingston Christian Reformed Church, One Way Christian Church, Redeemer Christian Church, and Summerleas Christian Church.

*Staff* – For the purposes of this policy, staff includes the Network pastoral staff, office staff, group leaders, interns, volunteers, and MTS Apprentices.

*Breach* – A breach occurs when a staff member from the Network discloses or uses an individual's information in a manner prohibited by this policy.

*Confidentiality* – Where a Network employee or relevant staff member is required to keep information confidential, this means that they are not to share the information by any means, (including verbally) with any other person (partner, spouse, or other staff member included), post the information publicly (including any website, personal or otherwise) during and after they cease their employment or position within the Network.

*Personal Information* – Personal information is information or an opinion about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion. An individual's Personal Information includes, and is not limited to, the following:

- an individual's name
- address
- date of birth
- contact details,
- profession or occupation
- if the individual makes a financial payment to the Network, the individual's Financial Information (such as bank account details or credit card details)

Sensitive Information – Sensitive Information is Personal Information about an individual's:

- racial or ethnic origin
- membership of political bodies, religions or trade unions
- sexual preferences or activities
- criminal record
- health and genetic information
- medical history

*Computer Systems and Software* – Computer systems and software that are owned and/or run by the Network. This may refer to a Church's website, the Network's data server, and web services run to function day to day, such as Elvanto, Twilio, Microsoft Office 365, ChildSafe/SMO and Mail Chimp.

*Elvanto* – Elvanto a Church Management Software (also referred to as a database) used by the Network. It is a cloud-based service, meaning that information is not stored on site at any of the Network churches (or the Office). Elvanto has been chosen due to its locality (the servers that store the information are based in Australia, and therefore are subject to APPs), its security (if you have any queries about the security of Elvanto <u>click here</u> to view their webpage on security), and the ability to manage who has access to people's personal information within the Network.

*Planning Center* – Planning Center (PC) is another Church Management Software (also referred to as a database) used by the Network. It is a cloud-based service, meaning that information is not stored on site at any of the Network churches (or the Office). If you have any queries about the security and privacy of information in PC, <u>click here</u> to view their webpage on security.

*Twilio* – Twilio is a cloud-based communications platform used in conjunction with Elvanto to send and receive SMS communications. Data associated with this platform is stored overseas in the United States of America in accordance with their national and state laws, as well as the Australian Privacy Act 1988. If you have any queries about the security and privacy of information in Twilio, <u>click here</u> to view their webpage on security.

*Microsoft Office 365* – Microsoft accounts are utilised for staff email and online document collaboration. Similar to Elvanto, it is a cloud-based service. If you have any queries about the security and privacy of information in Microsoft Office 365, <u>click here</u> to view their webpage on security.

*ChildSafe / Safety Management Online (SMO)* – SMO is the website that houses our ChildSafe training and safety platform and all associated information and files, including long-term archived data. If you have any queries about the security and privacy of information in ChildSafe/SMO, <u>click here</u> to view their webpage on security.

*Mail Chimp* – Mail Chimp is utilised by some churches for emailing newsletters. People's emails are stored in Mail Chimp (with their permission), so their church can email them updates about what is happening within the church. Data associated with this platform may be stored overseas but is done so to the extent permitted by applicable laws and regulations. If you have any queries about the security and privacy of information in Mail Chimp <u>click here</u> to view their webpage on security.

# Information Collected and Stored

We may collect and store personal information such as:

- Contact information (Phone or mobile number, email address, and mailing address)
- Date of birth
- Marriage details (place and date of marriage)
- Volunteer roles
- Expertise and interests
- Financial information, such as bank account details or credit card details (if the individual gives financially to the church they attend). *Please note: this financial information will be stored separately (on a password protected computer in a locked room), to the personal information stored in our Computer Software.*
- Sensitive information (such as your health, family and personal circumstances, Working with Vulnerable People check) that you provide to us, including information shared during pastoral visits, prayer and when contacting our staff.
  - We will only collect the sensitive information that is necessary for us to provide you with the relevant care.
- Video or photographic footage, with your permission, of when you attend our weekend services, events, camps, courses and other programmes
- Details of events or camps that you previously attended, together with any additional information necessary to run the event or camp
- Any additional information relating to you that you provide to us directly through email communication, our church websites, or in our database.

### How We Collect and Store This Information

#### Collection of Information

We collect your personal information directly from you, or from interactions between staff within the Network (e.g. in staff or session meetings). When collecting personal information from you, we may collect it in ways including:

- When you complete paper and electronic forms, such as event registration forms, and partnership forms;
- When you complete the giving envelopes during weekend services or events or when you give through various methods, such as our website, telephone and post;
- When you sign in and use our Computer Systems and Software;
- When you access and use one of our church websites to register, give online or to enquire;
- When you access our services, events and programs;
- When you email or telephone us;
- When you visit the church websites;
- When you voluntarily provide us with your details for us to add you to our database and mailing lists;
- During conversations or prayer sessions, in person or on the telephone, between you and our staff and ministry leaders;
- During interviews, meetings and discussions, formal and informal, with our staff and ministry leaders; and
- When you attend our weekend services, events, camps, courses and our other programmes, or

• When you give us permission to take your photo or video, of yourself on your own, or with others.

We may also collect your personal information from third parties such as:

- From the Department of Justice regarding Working with Vulnerable People (WWVP) checks that are required for you to volunteer or work with us in particular areas; and
- From any other agencies and other government entities as and when required (e.g. Centrelink).

We may receive unsolicited personal information where we did not request the information. Unsolicited personal information includes misdirected mail received, correspondence sent to us by the public, employment and volunteer applications sent on an individual's own initiative and not in response to our advertised vacancy, promotional flyers containing personal information. We reserve the right to assess all unsolicited personal information received and to de-identify or destroy it within a reasonable time period in accordance to Australian Privacy Principle 4.

We may also take photographs and/or film some of our events, camps, and courses for the purpose of promotion and use by members within the Network. We take reasonable care to avoid identifying you directly however we acknowledge that there will be situations where you may be identified in our photographs and/or video. If you do not want to be identified in any photographs or video that we take during our weekend services, events, camp, and courses, please contact our Network Office Manager, details which are listed at the end of this document.

We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure. We may hold your information in either electronic or hard copy form. All personal information is stored:

- in a password secured database;
- on password secured personal computers; or
- in locked filing cabinets.
- Two-factor authentication (2FA) is in place on all programs where it can be enabled.

Sensitive information is kept even more restricted to only those who need to access the information for the undertaking of their ministry.

Workstations rooms and relevant software applications will either be locked or logged off when unattended to prevent unauthorised access. Personal information on paper will be kept in secure storage and be protected by any other security measures appropriate for maintaining the required level of confidentiality and privacy. Documents with personal information will not be left visible and unattended in work areas. When personal information is no longer needed for the purpose for which it was collected, we will destroy it (or de-identify it).

We will retain personal information for as long as it is necessary to provide services to you and as required by law, or until it is no longer necessary for the purpose for which it was collected. After this period, information will be securely destroyed or de-identified. However, we may also be required to keep some of your personal information for specified periods of time pursuant to specific laws relating to companies, not-for-profit organisations, financial reporting legislation and relevant safeguarding of information. For information specific to the relevant safeguarding of information, we will remove this data from our databases when it is no longer required for us to provide services to you and store it on our long-term archive system.

# Purposes for which We Collect, Store, Use, and Disclose Personal Information

The Network will only collect information that is needed in undertaking its vision. (see below)

We will collect information for the purpose of:

- Organising day-to-day activities that each church undertakes (Sunday services, camps, small groups, and other ministries)
- Communicating with you about updates from Network churches.
- Undertaking Pastoral Care for members within the Network
- To answer enquiries, provide information or advice about existing and new services, events and programs occurring within the Network
- To update our records and keep your contact details up to date
- To provide the national body (Christian Reformed Churches of Australia) with de-identified details about the Network churches for denominational statistics
- To process and respond to any queries made by you
- To comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority
- To keep historical records of the Network churches

Your personal information may also be used for other specific purposes for which it was requested and which was advised to you prior to collection. Your personal information will not be shared, sold, rented or disclosed other than as described in this Privacy Policy.

We may collect unidentifiable data such as number of attendees at our events, and Sunday services to assist us to better understand the response of our congregations and the community.

We may disclose your personal information to:

- Staff and ministry leaders (to an extent) and service providers (such as New Front Door) for the purposes of the operation of our database, websites, mailing lists, and undertaking tasks on your behalf (such as ordering an item online).
- Suppliers and other third parties with whom we have commercial relationships, for example our local bank, camp sites, and caterers for events.
- Any organisation for any authorised purpose with your express consent.

### Access and Correction of Personal Information

There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others or if it would result in a breach of confidentiality. If that happens, we will give you written reasons for any refusal. If you believe that personal information we hold about you is incorrect, incomplete or inaccurate, then you may request us to amend it, by contacting the Network Office Manager (contact details below).

We will store personal information securely so that I can only be readily accessed by those with a legitimate reason for using it and is protected from interference, misuse, loss or unauthorised access.

#### Complaints About the Privacy of Information Within the Network

If you believe that your privacy has been breached, please contact us using the contact information below and provide written details of the incident so that we can investigate it. We endeavour to

respond to your complaints within a reasonable period of time upon receiving all the relevant information. Any complaints will be passed onto the relevant Pastor, and investigated with utmost seriousness by the Network Staff, and any breaches rectified immediately. If you are not satisfied with our response to your complaint, please contact the Australian Information Commissioner (www.oaic.gov.au).

### Disclosure to Other Parties

We note that our email client (<u>Microsoft Office 365</u>), database (<u>Elvanto</u>), SMS provider for Elvanto (<u>Twilio</u>) and emailing marketing service provider used by some churches in the Network (<u>Mail Chimp</u>), may allow data to transmit through servers in other countries. We will not disclose any information to parties outside of those used in services to undertake the Network's purposes (explained above). To view security FAQs about these providers, please see their security webpages linked above. If you have any concerns, feel free to contact the Network Office Manager (details below).

#### New Front Door - Cross-border disclosure of personal information

Some Network church websites are hosted by New Front Door (formerly Vision 100 IT), which uses Amazon to host its servers, and PayPal to manage event payments, both of whose information is stored in the United States.

# Contacting Us

If you have any questions about this privacy policy, any concerns or complaints regarding the treatment of your privacy, or a possible breach of your privacy, please contact our Network Office Manager using the details set out below. We will treat your requests or complaints confidentially. We will contact you within a reasonable time after receipt of your written complaint and all requested information to discuss your concerns and outline options regarding how they may be resolved. We will aim to ensure that your complaint is resolved in timely and appropriate manner.

For all privacy concerns, please contact our Network Office Manager at:

Network of Christian Reformed Churches Post: PO Box 64, Kingston TAS 7051 Tel: (03) 6229 2268 Email: <u>office@crcsouthtas.org</u>

### Changes to Our Privacy Policy

We may change this privacy policy from time to time. Any updated versions of this privacy policy will be posted on the websites of the Network churches, and physical copies are available upon request to the Network Office.

This privacy policy was last updated on 21 November 2024.